REGULATORY REVIEW DOCUMENTS

TENNESSEE SEWING MACHINE ATTACHMENT CO., INC.

(4 Pages)

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

NEW

1. Organization's full, legal name			EPA identification code
Tennessee Sewing Machine Attachment Co.,Inc.			TNR000005991
2. Mailing address	City	State	Zip code
P. O. Box 188	White Bluff	Tn	37187-0188
3 a. Site address	City	State	Zip code / County name
4600 Highway 70	White Bluff	Tn	37187-0188 / Dickson
b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)		
4. Owner name (may be corporation or company name)		Type	Phone with area code
Tennessee Sewing Machine Attachment Co.,Inc.		c	615-797-3144
5. Manager or operator name		Type	Phone with area code
Robert E. Galya, President			615-797-3144
6. Principal technical contact	FAX number with area code		Phone with area code
Kerry L. Gooch	615-797-4716		615-797-3144

7. Number of employees	Year operation began	SIC codes (Primary SIC first,etc.)	Job shop
47	1977	3559	Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	Robert Galya	24 hrs	615-446-7311
b.	Thomas Galya	24	615-446-2848
c.	Kerry Gooch	24	615-441-1849
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No X.

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
X	President	2-26-98

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
02/27/98	22		Yes (No)	Yes (No)	

12. Date closed	TSDR status	Transporter status

13. Comments

RECEIVED
FEB 27 1998
Div. of
Solid & Hazardous Waste
RDA 2208

CN-0909 (Rev. 11/95)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility	EPA identification code
Tennessee Attachment Co., Inc	

2. Waste name. Use standard name from regulations whenever possible.	WASTE STREAM NUMBER
Waste Potassium Cyanide	1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1998	2/14/98	Continuous Accidental/ Various (One time)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). E F	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
	P098, D003	3559

5. Physical form code 9	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Granular Solid	100	0	9	0	0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
82 Kg	82 Kg	82 Kg	7

7. DOT shipping name	DOT hazard class	DOT ID code
Waste Potassium Cyanide	6.1	UN1680

8. Describe the generation process.
Unused Potassium Cyanide ~~that was~~

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume(X), % weight( ), PPM( )
N/A	N/A	1	

Hazardous constituents. Give range of values at right.	lower value	upper value
A. Potassium Cyanide		100
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

S01/T~~05~~27/D81

RECEIVED
FEB 27 1998
Div. of
Solid & Hazardous Waste

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1535

Waste Generator Notification Fee

Effective December 28, 1992, Rule 1200-1-11-.08(2) of the Tennessee Hazardous Waste Management Fee Regulations requires new generators to submit a one-time application fee of $50.00 along with their first-time notification. The fee must be received by the Department before an EPA ID Number can be assigned and the notification reviewed.

Please enter information requested below and return this letter to the above address along with your application fee to insure proper processing. NOTICE: Make your check payable to *Treasurer, State of Tennessee*.

NAME	Tennessee Sewing Machine Attachment Company, Inc.
MAILING ADDRESS	P. O. Box 188
CITY, STATE AND ZIP CODE	White Bluff, Tn 37187-0188
SITE LOCATION	
CONTACT NAME	Kerry Gooch
PHONE NUMBER WITH AREA CODE	615-797-3144
AMOUNT ENCLOSED: $	50.00

For DEPARTMENT use only:

LOG ID CODE	STAFF INITIALS	NEWLY ASSIGNED EPA ID CODE
208C	DBW	TNR 00 000 599

CD NO.	DATE RECEIVED	AMOUNT	RECEIPT NO.	COMMENTS
ASW2128		50.00	AC6888	

RECEIVED
FEB 27 1998
RDA 2203
Div. of
Solid & Hazardous Waste

CN-1033 (Rev. 11/95)

DSWM
L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243 - 1535

March 9, 1998

Tennessee Sewing Machine Attachment Co., Inc.
ATTN: KERRY L. Gooch
P.O. Box 188
White Bluff, TN. 37187-0188

Re: EPA ID Number
Site Location: 4600 Highway 70
White Bluff, TN. 37187-0188

Dear Mr. Gooch:

This letter will serve as official notice of your EPA ID Number TNR 00-000-5991 which should be used on all reports and correspondence submitted to the Department.

The EPA ID Number is assigned to this specific physical location. Should you ever relocate, you would be required to apply for a new EPA ID Number for that location.

PLEASE NOTE: If you generate greater than 100 kilograms (220 pounds) in any month, you must file an Annual Report with the Division of Solid Waste Management and pay a Generator Fee by the following March 1.

If you have further questions about this subject please contact Dennis Woodson at (615) 532-0487.

Sincerely,

Barbara Donohoe

for Bobby W. Morrison, Manager
Waste Activity Audit
Division of Solid Waste Management

BWM/DW/jk/gooch

cc: Nashville Field Office

REGULATORY REVIEW DOCUMENTS

TENNSCO COPORATION

(74 Pages)

HAZARDOUS WASTE FACILITY INSPECTION

SITE INSPECTED

Tennsco Corporation
Plant I - East Broad Street
P. O. Box 606
Dickson, Tennessee 37055
TND 004035853

PRIMARY CONTACT

Mickey Self

INSPECTION DATE AND TIME

February 15, 1985
Starting at 9:00 a.m.

INSPECTOR AND REPORTER

Bob Gardner
701 Broadway, B-30
Nashville, Tennessee 37219-5403
742-6649

PURPOSE OF INSPECTION

This routine unannounced full inspection was conducted to evaluate Tennsco's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

EVALUATION BASIS

Generator of hazardous waste - Rule 1200-1-11-.03

FACILITY DESCRIPTION

One hazardous waste is generated at this location - Flammable Liquid D001 consisting of bad paint, and paint equipment flush solvent. All waste is accumulated in 55-gallon drums and pumped into the transport tanker. Waste paint sludge from a high solids paint line has been evaluated and found to be non-hazardous. This waste is also sent to a secure landfill for disposal only because it can not be suitably handled at the local sanitary landfill.

MANIFEST SUMMARY

Date	Quantity	Date	Quantity
1-07-83	2310 Gallon	2-01-84	4000 Gallon
2-16-83	1815	2-06-84	3520
3-29-83	1705	2-10-84	1650
5-27-83	1320	3-29-84	2860
6-30-83	1595	6-12-84	2145
9-20-83	4725	8-23-84	5000
10-21-83	2695	10-20-84	3650
2-04-85	4600		

	1983	1984
Total Quantity Shipped, Kg.	55,000	65,000
Monthly Generation Rate, Kg.	5,300	4,900

Specific Gravity = 0.9, Assumed 55 gallon per drum.

Transporter - Resource Recycling Tech. - TND 081455891
Facility - Chem-Fuel - TND 000737510

COMMENTS

At the time of the last hazardous waste inspection on August 23, 1982, Tennsco had two plants located about two miles apart in Dickson with both generating a hazardous waste. Only the Broad Street plant had been assigned an identification number (TND 004035853). Wastes from both plants have been manifested under this I.D. number. Tennsco has been asked to submit a generator notification for the second plant located in the old Winner Boat facility.

INSPECTION FINDINGS

The following violations of Rule 1200-1-11-.03 were found at the time of inspection:

1. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program, at a minimum be designed to ensure that employees are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems including where applicable: (1) procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) key parameters for automatic waste feed cut-off systems (if any); (3) communications or alarm systems; (4) response to fires or explosions; (5) response to ground-water contamination incidents; and (6) shutdown of operations. (0107)

2. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

3. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

4. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management. (0127)

5. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)

6. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste. (0135)

7. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains training records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

8. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator designs his contingency plan to minimize hazards to public health or the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. (0157)

9. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the actions employees must take to immediately respond to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the accumulation area(s). (0165)

10. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate a hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) will immediately: activate internal alarms or communication systems, where applicable, to notify all other affected employees; and notify appropriate State or local agencies with designated response roles if their help is needed. (0166)

11. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is a release, fire, or explosion the emergency coordinator will immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records and if necessary, by chemical analysis. (0167)

12. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will concurrently assess possible hazards to public health or the environment that may result from a release, fire, or explosion. The assessment must consider both direct and indirect effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. (0168)

13. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will immediately notify appropriate local authorities and the Tennessee Emergency Management Agency, if he determines that the facility has had a release, fire, or explosion which could threaten public health or the environment outside the facility, and then be available to help the appropriate officials decide whether local areas should be evacuated. (0169)

14. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable collecting and containing released waste, and removing or isolating containers. (0171)

15. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)

16. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s): no waste that may be incompatible with the released material is stored in the accumulation area until clean-up procedures are completed; and all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

17. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have been completed and all emergency equipment has been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulation area(s). (0175)

18. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, within 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)

19. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, as appropriate for the type of waste handled at the accumulation area and the potential need for the services of these organizations. (0177)

20. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate a hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists the names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator and keep this list up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. (0185) The office phone number has not been listed.

21. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a brief outline of the capabilities of each item on the list of emergency equipment at the accumulation area (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required. (0197)

22. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes an evacuation plan for employees where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires). (0205)

23. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains a copy of the contingency plan and all revisions to the plan and submits them to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. (0207)

24. Rule 1200-1-11-.03(5)(b)1 requires a generator to submit an annual report to the Department by March 1 for the preceding calendar year. (0432) Reports have not been received for 1982 or 1983.

25. Rule 1200-1-11-.03(5)(b)1 requires a generator who ships his hazardous waste off-site to submit an annual report on forms provided by the Department and the form completed according to the instructions accompanying it. (0435)

26. Rule 1200-1-11-.03(4) requires each generator who ships hazardous waste off-site for storage, treatment, or disposal to submit along with the annual report an annual maintenance fee of 100 dollars ($100). (0437)

27. Rule 1200-1-11-.03(4)(b)1(i) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator, if the waste is stored in containers, ensures that containers holding hazardous waste are always kept closed during storage, except when it is necessary to add or remove waste. (0447)

28. Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

29. Rule 1200-1-11-.03(4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste is being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste". (0525)

30. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator accumulates the hazardous waste in a manner which will minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten public health or the environment. (0535) Area where waste is stored in drums was observed to be very cluttered making proper management difficult.

31. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the accumulation area(s) is equipped with a devise, such as a telephone (immediately available at the scene of accumulation) or a hand held two way radio, capable of summoning emergency assistance from local police departments, fire departments, or State and local emergency response teams, unless none of the hazards posed by the waste accumulated warrent this kind of equipment. (0555) The closest phone is approximately 200 feet from the storage area and is judged to be too remote for calling in assistance.

32. Rule 1200-1-11-.93(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains adequate aisle space to allow the unobstructed movement of employees, fire protection equipment, spill control equipment, and decontamination equipment in any emergency, unless aisle space is not needed for any of these purposes.

SIGNED: Bob Gardner
Bob Gardner

DATE: 2/26/85

57800 DSWM Lic

FY 85-86 Remedial Action (SUPERFUND) Fee Worksheet

the Hazardous Waste Management Program of the Department of Health and Environment.
ision of Fiscal Services, 6-620 Cordell Hull Building, Nashville, TN 37219.

EPA ID CODE IND 00-003-5853 Y=U
TICKEY SPLF
ENNSCO CORP PLANT 1
O BOX 606
ICKSON TN 37055

Please complete and return to the above address. Please correct any incorrect information on the label. See the instruction pages and regulations for detailed information for completing this form. For technical assistance, call (615) 741-6237.

1. Enter the total amount of hazardous wastes generated during the year of Jan. 1, 1984 to Dec. 31, 1984, or, if no hazardous wastes were generated in the year of 1984, enter the amount of hazardous wastes generated from January 1 through April 30, 1985. Enter to the right the year the wastes were generated as 1984 or 1985.	110,054 kg 1984 year	
2a. Waste amount from fossil fuel combustion.	kg	g. Municipal incineration waste amount. kg
b. Ore mining waste amount.	kg	h. Waste excluded by petition amount. kg
c. Applicable energy associated waste amount.	kg	i. Transportation spill waste amount. kg
Cement kiln dust waste amount.	kg	j. Hazardous wastes no longer generated after April 30, 1985. kg
e. Wastewater treatment plant influent waste amount. (See permit requirements.)	kg	k. Hazardous wastes produced from on-site treatment unless the original waste was excluded. kg
f. Public Owned Treatment Works (POTW) sludge waste amount.	kg	l. Inactive site clean-up waste amount. kg
m. Enter the sum of lines 2a - 2l to the right		kg
3. Enter the difference between line 1 and line 2(m).	110,054	kg
4. If 1984 was entered in line 1, enter the amount of line 3 into line 4. If 1985 was entered in line 1, compute an estimated annual total amount of hazardous wastes generated by dividing line 3 by the number of months wastes were generated in the first four months of 1985 and multiplying by 12. If an alternative estimation method is used, check and attach documentation: ( ).	110,054	kg
5. Enter the correct fee from Table 1 which is located at the end of this form. Use the waste amount from line 4 above to determine the fee.	$ 4000.00	
6. If an acutely hazardous waste was generated from January 1, 1984 through April 30, 1985 and shipped off-site for disposal, enter $500.00. If this waste was not landfilled, check and attach documentation: ( ).	$	

PH-2387, (SWM rev. 3/85)

Form is continued on the back.

1/165/8-12-85/4,847.00/28761

22-31

JUL 03 1986

7-7 & met

DSWM L&C

Certified Mail
P 673 133 441
Return Receipt Requested

JMA 7-9

file

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

July 2, 1986

Mr. Mickey Self
Tennsco Corportaion
P.O. Box 606
Dickson, TN 37055
TND 004035853

RE: Hazardous waste generator facility inspection
NOTICE OF VIOLATION

Dear Mr. Self:

On June 19, 1986, a routine, unannounced hazardous waste generator inspection was conducted at Tennsco in order to determine this facility's compliance with applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee. Violations noted during the inspection include the following:

Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

Rule 1200-1-11-.03 (4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste in being accumulated on-site, each container and tank is labeled or marked clearly wiht the words, "Hazardous Waste". (0525)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.7 provided that the generator ensures that the accumulation area(s) is equipped with portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas or dry chemical), spill control equipment, and decontamination equipment, unless none of the hazards posed by the waste accumulated warrent this kind of equipment. (0565)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator tests and Maintains all communications or alarm systems, fire protection equipment, where required, as necessary to assure it proper operation in time of emergnecy. (0585)

Rule 1200-1-11-.03(2)(d) requires generators to be responsible for maintaining an up-to-date notification file by notifying the Department in writing of significant changes in the information submitted within 30 days after such changes. (0027)

Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator inspects the area where ocntainers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. (0035)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

Rule 1200-1-11-.03(4)(b)(iv) allows a genreator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate ahzarodus waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management (0127)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)

Rule 1200-1-11-.03(4)(b)(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the gneerator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste (0135)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains training records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, collecting and containing released waste, and removing or isolating containers. (0171)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, if the facility stops operations in response to a fire, explosion, or release, the emergency coordinator will monitor for leaks, pressure buildup, gas generation,or ruptures in valves, pipes, or other equipment, wherever this is appropriate. (0172)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s): no waste that may be incompatible with the released material is stored in the accumulation area until contingency plan is cleaned and is fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have bee completed and all emergency equipment had been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulatin area(s). (0175)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, within 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, as appropriate for the type of waste handled at the accumulation area and the potential need for the services of these organizations. (0177)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a breif outline of the capabilities of each item on the list of emergency equipment at the accumulation area (such as fire extinguishing systems, apill control equipment, communications and alarm systems (internal and external and decontamination equipment), where this equipment is required. (0197)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.78 provided that the generator's contingency plan includes an evacuation plan for employees where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires). (0205)

As you can see, most of the violations noted are of a documentation nature and should be relatively easy to correct. A follow-up inspection will be conducted on August 12, 1986 to determine if these violations have been corrected.

Enclosed with this letter is a blank Hazardous Waste Stream Description sheet. Your previously submitted Hazardous Waste Description (dated 3-27-85 and signed by you) indicated a monthly maximum generation rate of 728 Kg, which is highly inaccurate according to the amount of waste shipped off-site from this facility as shown on your 1985 (and including through 6-2-86) manifests. Please recalculate your generation rate, complete this form, and return it to me at the address shown on the form.

I would like to thank you for your cooperation shown during the inspection during what was an obviously hectic day for you. Should you have any questions, or if I can be of any assistance to you, please feel free to call me at 742-6649.

Sincerely,

Bob Vaughan

Bob Vaughan
DIVISION OF SOLID WASTE MANAGEMENT

BV/kdk

DSWM L&C

Hazardous Waste Facility Description

Tennessee Department of Public Health, Division of Solid Waste Management,
Customs House, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility.			EPA identification code
Tennsco Corp. Plant 1			TND-403-5853
2. Mailing address	City	State abbrev.	ZIP code
P.O. Box 606	Dickson	TN	37055

3a. Does your organization generate waste which is determined to be hazardous by Rule 1200-1-11-.03(1)(b)? (Yes) No

b. Does your facility treat, store, or dispose of hazardous waste subject to permitting rules of 1200-1-11-.07(1)(b)? Yes (No)

4. Do you request a partial exemption because you are a small generator of hazardous waste as defined in rule 1200-1-11-.02(1)(e)? Yes (No)

5. Facility physical location or address.	6. Facility county name
E Broad Street, Dickson , Tennessee 37055	Dickson

7. Owner name	Phone with area code
Lester D. Speyer	615-446-8000

8. Manager or operator name	Phone with area code
Jerry Estes	615-446-8000

9. Principal technical contact	Phone with area code
Mickey B. Self or Stuart Speyer	615-446-8000

10. Number of employees	Year oper. began	SIC codes (Primary SIC first,etc.)	Job shop
204	1963	2522	Yes No

11. Emergency contacts for 24 hours per day and 7 days per week.

	Name	Time period covered	Phone with area code
a.	Jerry Estes	anytime	615-446-2511
b.	Kerry Dysinger	anytime	615-446-3380
c.	Richard Manley	anytime	615-446-6562
d.	Mickey Self	anytime	615-789-5618

12. Current environmental permits for air water, solid waste and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit.

994298P L 994301P

13. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of owner or manager	Title	Date

Below is for Public Health use only.	14. Date Received	County Code	Priority	Major Genr.	Major TSDF
	8-12-85	22	L		

15. Public Health comments.

Hazardous Waste Description

Tennessee Department of Public Health, Division of Solid Waste Management.
Cordell Hull Building, 426 5th Avenue North, Nashville, TN 37247-4001

1. Organization's full name at facility.
Tennsco Corporation Plant #1

EPA identification code
TND04035853

2. Waste name. Use standard name from regulations whenever possible.
Flammable Liquid

Waste page #
(1)

EPA waste code
D001

3. Is this waste listed in the regulations in Rule 1200-1-11-.02(4)? Yes (No)

4. Does this waste qualify as hazardous under the criteria of Rule 1200-1-11-.02(3)? (Yes) No

5. Is this waste exempted from certain regulations according to Rule 1200-1-11-.02(1)(d)3(ii), for example, fly ash, drilling fluids, mining wastes, and cement kiln dust? Yes (No)

6. Give the years that this waste has been generated or processed by a treatment, storage, or disposal facility.
Since 1963 22 years

7. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Otherwise toxic (f). codes A

8. Physical form
Liquid

Percent solid
75%

3-75

9. Generation or handling rate in kilograms (KG).
Monthly Average: 364
Monthly Maximum: 728
Annual average: 4,368

Frequency of generation
Continuous Seasonal Various

10. Amount stored (Ave. KG)
2,184

Days stored (ave.)
90

Transportation mode
Rail, Water, Highway, Air, Other - H

DOT shipping name
Flammable Liquid

DOT hazard class
~~UN1993~~

DOT ID. code
~~D001~~ UN 1993

11. Describe generation process.

Bad paint & paint thinner mixed for paint equipment clean-up & paint sludge from water wash booths.

Lines 12/15 on back. Below is for Department use only.

16. Complete?	Test results?	Reasonable?	Follow-up	DOT Haz. Class	Curr. Gen.	Initials
Yes (No)	Yes (No)	(Yes) No	(Yes) No	07	(Yes) No	RLG

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8)

Status Code: 6

Date Received: 8-13-85

17. Public Health Comments.

PH-2022 (SWM 8/82 Rev.)

Hazardous Waste Notification

Tennessee Department of Health and Environment, Division of Solid Waste Management
Customs House - Fourth Floor, 701 Broadway, Nashville, Tennessee 37219-5403

1. Organization's full name at facility.
TENNSCO CORPORATION (PLANT 1)
EPA identification code: TND004035853

2. Mailing address: P.O. BOX 606
City: DICKSON
State abbrev.: TN
ZIP code: 37055

3. Facility physical location or address.
EAST BROAD ST
Facility county name: DICKSON

4. Owner name
LESTER D. SPEYER
Phone with area code: (615) 446 8000

5. Manager or operator name
JERRY ESTES
Phone with area code: (615) 446 8000

6. Principal technical contact
MICKEY SELF
Phone with area code: (615) 446 8000

7. Number of employees: 151
Date operation began: 1963
SIC codes (Primary SIC first,etc.): 2522
Job shop: Yes (No)

8. Emergency contacts for 24 hours per day and 7 days per week.

	Name	Time period covered	Phone with area code
a.	JERRY ESTES	ALL TIMES	(615) 446 2511
b.	KERRY DYSINGER	"	(615) 446 3380
c.	RICHARD MANLEY	"	(615) 446 6562
d.	MICKEY SELF	"	(615) 789 5618

9. Current environmental permits for air water, solid waste and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit.

994298P & 994301P

10. Certify that the information given in this document is true, accurate and complete by signing and dating.
Signature of authorized representative: Mickey B Self
Title: PURCHASING AGENT
Date: 7/17/86

Below is for Department use only.	11. Date received	County code	Priority	Generator	Small generator	Major generator
	1/16/87	22		Y	N	

12. Date closed	Date regulated	Date deregulated

13. Comments

PH-2019A (SWM 12/85 Rev.)

Hazardous Waste Stream Description

Tennessee Department of Health and Environment, Division of Solid Waste Management
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility. TENNSCO CORP. (PLANT 1) | EPA identification code: TND 004035853

2. Waste name. Use standard name from regulations whenever possible. FLUSH SOLVENT | Waste Stream ID: 1 | EPA waste code: F005

3. Give the years that this waste has been generated, e.g. 1975, 1982-1984, June 1985- - SINCE 1963 -

4. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
(Ignitable (a)), EP toxic (b), Corrosive (c), Reactive (e), (Otherwise toxic (f)).

5. Physical form: LIQUID | Percent solid: APPROXIMATELY 10% 5-10

6. Generation rate in kilograms (KG). Supply both rates. Monthly Maximum: 2400 | Annual average: 20,700 | Volume to weight conversion (pounds per gallon): 8.15

7. Maximum amount stored in kilograms: 4800 | Maximum days stored: 90 | Frequency of generation: (Continuous) Accidental Various

8. DOT shipping name | DOT hazard class | DOT ID. code

9. Describe generation process.
* A SOLVENT MIXTURE OF 75% TOLUENE / 25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINT EQUIPMENT. ADDITIONALLY SCRAP PAINT-OFF-SPEC- IS COLLECTED WITH THE FLUSH SOLVENT.

Lines 10/14 on back. Below is for department use only.

15. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Initials
(Yes) No	Yes (No)	Yes No	Yes (No)	Ø7	MAH

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8) | Status Code: 6 | Date Received: 1/16/87

16. Comments.

PH-2022 (SWM 12/85 Rev.)

JAN 28 1987 DSWM L&C

Hazardous Waste Notification Summary JAN 09, 1987

)e full instructions for form PH-2019 for additional information and codes.

1. Organization's name
TENNSCO CORPORATION (PLANT 1)
: EPA ID CODE
TND 00-403-5853

2. Mailing address
P.O. BOX 606
: City
DICKSON
: State : ZIP code
TN 37055

3. Physical location or address
EAST BROAD ST
: County name
DICKSON

4. Owner name
LESTER D SPEYER
: Phone
(615) 446-8000

5. MANAGER OR operator name
JERRY ESTES
: Phone
(615) 446-8000

6. Principal technical contact
MICKEY SELF
: Phone
(615) 446-8000

7. Number of employees : Year began : SIC codes : Job shop
151 : 1963 : 2522, , , : NO

8. Emergency contacts for 24hours per day and 7 days per week

	Name	Time period covered	Phone
A	JERRY ESTES	HOME	(615)446-2511
B	KERRY DYSINGER	HOME	(615)446-3380
C	RICHARD MANLEY	HOME	(615)446-6562
D	MICKEY SELF	HOME	(615)789-5618

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.
NONE 994298P AND 994301P 994298P L 994301P 994298P & 994301P 994298P & 994301P

10. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date

→ Mickey B Self Purchasing Asst 1-23-87

Below is for Department use only.

11. Date rcvd : County : Priority : Generator : Small Gen. : Special status
012887 : : 73 (Yes) No : Yes (No) :

12. Date closed : Date regulated : Date deregulated

13. Comments

DSLM JAN 28 1987 L&C

Hazardous Waste Stream Report - Page 1 of 2 JAN 09, 1987

Full instructions for form PH-2022 for additional information and codes.

1. Organization's name. : EPA ID CODE
TENNSCO CORPORATION (PLANT 1) TND 00-403-5853

2. Waste name. : Waste stream ID
FLUSH SOLVENT 1

3. Give years this waste has been generated. : Frequency of generation
1963 CONTINUOUS

4. Mark all appropriate hazard criteria below. : EPA waste codes.
Ignitable (a),EP toxic (b), Corrosive (c), F005
Reactive (e), Other toxic (f)
CODES: AF

5. Physical form : Percent solid : Volume to wt. (lb/gal)
LIQUID, OTHER BASED 10% ~~80.0~~ 8,15

6. Generation rates in kilograms.
Monthly maximum : Annual average : Max. amount stored : Max. days stored
2400 ~~1,600~~ 20,700 ~~19,200~~ 4,800 90

7. DOT shipping name : DOT hazard class : DOT ID code
WASTE FLAMMABLE LIQUID FLAMMABLE LIQUID 1993

8. Describe generation process.
BAD PAINT & PAINT THINNER MIXED FOR PAINT EQUIPMENT CLEAN- UP. A SOLVENT MIXTURE OF 75% TOLUENE/25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINTING EQUIPMENT. THE WASTE MAY BE APPROXIMATELY 80% SOLVENT MIXTURE AND 20% PAINT.

*** ANNUAL REPORT SECTION *** Lines 9-11.

9. If the waste was shipped off-site, also submit Annual Shipping Report for Hazardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report year	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes
1986	8965	~300. Kg	~300 Kg	S01,T50,

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods. SEGREGATING THIS WASTE AND NON-HAZARDOUS PAINT SLUDGE.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

Hazardous Waste Stream Report - Page 1 of 2 JAN 28 1987 JAN 09, 1987

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
TENNSCO CORPORATION (PLANT 2&3)
: EPA ID CODE
TND 98-084-5390

2. Waste name.
FLUSH SOLVENT
: Waste stream ID
1

3. Give years this waste has been generated.
1980
: Frequency of generation
CONTINUOUS

4. Mark all appropriate hazard criteria below.
Ignitable (a),EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES: AF
: EPA waste codes.
F005

5. Physical form
LIQUID, OTHER BASED
: Percent solid : Volume to wt. (lb/gal)
10% ~~00.0~~ 8.15 ~~8~~

6. Generation rates in kilograms.
Monthly maximum : Annual average : Max. amount stored : Max. days stored
8000 ~~5,000~~ 68,000 ~~46,000~~ 17000 ~~17,400~~ 90

7. DOT shipping name
WASTE FLAMMABLE LIQUID
: DOT hazard class : DOT ID code
FLAMMABLE LIQUID 1993

8. Describe generation process.
A SOLVENT MIXTURE OF 75% TOLUENE /25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINTING EQUIPMENT, THE WASTE MAY BE APPROXIMATELY 80% SOLVENT MIXTURE AND 20% PAINT

*** ANNUAL REPORT SECTION *** Lines 9-11.

9. If the waste was shipped off-site, also submit Annual Shipping Report for Hazardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes
1986	26,200	~200 Kg	~220 Kg	S01,T54,D80

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

JAN 28 1987

Hazardous Waste Stream Report - Page 2 of 2 JAN 09, 1987

ull instructions for form PH-2022 for additional information and codes.

Organization's name.
TENNSCO CORPORATION (PLANT 283)

: EPA ID CODE
TND 98-084-5390

Waste name.
FLUSH SOLVENT

* Waste stream ID
1

12. Chemical Characteristics.

pH	Flash point	: Concentration units. For EP toxic wastes, indicate PPM.
	17C	

Major and hazardous consituents.	: lower	: upper
A TOLUENE	60	75 :
B METHYL ISOBUTYL KETONE	20	25 :

13. Describe handling methods with codes from instructions.

Treatment codes	:Storage codes	:Disposal codes	:Location
T5Y	S01	D80 (81)	OFF-SITE

14. Identify EPA ID code all transporter and TSDF operators involved in handling this waste.
~~TND000622464~~ ~~TND070512767~~ #ALD094476793

15. I certify that this information is true, accurate and complete.
SIGNATURE: (Generator or authorized representative), title and date.

~~Richard R. Self~~ Purchasing Agent 1-23-87

ow is for department use only.

Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
012887	: (Yes) No	: Yes (No)	: (Yes) No	: Yes (No)	MAH

Status: Not hazardous (1); Demonstrated not hazardous (2);
Small generator (3); Resource recovery (4); Partial exemption (5); 6
Hazardous (6); Accidental (7); No longer generated (8);
Variance granted (9); Conditionally exempt (A).

17. Comments.

THE ONLY WASTE STREAM NOW GENERATED IS FLUSH SOLVENT MIXED WITH SCRAP PAINT. - Statement by company

JAN 28 JAN 09, 1987

Hazardous Waste Stream Report - Page 1 of 2

See full instructions for form PH-2022 for additional information and codes.

NON-HAZARDOUS

1. Organization's name.
TENNSCO CORPORATION (PLANT 253)

: EPA ID CODE
TND 98-084-5390

2. Waste name.
PAINT SLUDGE

: Waste stream ID
2

3. Give years this waste has been generated.
1980

: Frequency of generation
CONTINUOUS

4. Mark all appropriate hazard criteria below.
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES: #

: EPA waste codes.
N000

5. Physical form
LIQUID, OTHER BASED

: Percent solid
100.0

: Volume to wt. (lb/gal)
10

6. Generation rates in kilograms.
Monthly maximum
813

: Annual average
9,750

: Max. amount stored
2,439

: Max. days stored
90

7. DOT shipping name
PAINT SLUDGE

: DOT hazard class
~~FLAMMABLE LIQUID~~
#

: DOT ID code
9189

Describe generation process.
PAINT SLUDGE FROM WATER WASH TOUCH-UP PAINT BOOTHS. *THIS WASTE IS NOT A HAZARDOUS WASTE. IT PASSES BOTH THE IGNITIBILITY TEST AND EP TOXICITY TEST. THE DSWM HAS ISSUED A "SPECIAL WASTE DISPOSAL" APPROVAL LETTER FOR PLACING IN A LOCAL SANITARY LANDFILL.

*** ANNUAL REPORT SECTION *** Lines 9-11.

9. If the waste was shipped off-site, also submit Annual Shipping Report for Hazardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

Hazardous Waste Stream Report - Page 2 of 2 JAN 09, 1987

See full instructions for form PH-2022 for additional information and codes.

Organization's name.
TENNSCO CORPORATION (PLANT 2&3) : EPA ID CODE
TND 98-084-5390

Waste name.
PAINT SLUDGE * Waste stream ID
2

12. Chemical Characteristics.
pH : Flash point : Concentration units. For EP toxic
7.0 176 : wastes, indicate PPM.
Major and hazardous consituents. : lower : upper

13. Describe handling methods with codes from instructions.
Treatment codes :Storage codes :Disposal codes :Location
D80 (7) OFF-SITE

14. Identify EPA ID code all transporter and TSDF operators involved in handling this waste.
ALD000622464

15. I certify that this information is true, accurate and complete.
SIGNATURE: (Generator or authorized representative), title and date.
[redacted] Agent 1-23-87

Below is for department use only.
16. Date rcvd Complete? Test results? Reasonable? Follow-up Initials
1/2887 : Yes (No) : Yes (No) : (Yes) No : (Yes) No MAH

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A). 2

17. Comments.

Hazardous Waste Stream Report - Page 1 of 2 JAN 09, 1987

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
TENNSCO CORPORATION (PLANT 1)

: EPA ID CODE
TND 00-403-5853

2. Waste name.
WASTE PAINT

: Waste stream ID
→ 2

3. Give years this waste has been generated.
1963

: Frequency of generation
CONTINUOUS

4. Mark all appropriate hazard criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f)
CODES: ~~A (a)~~ #

: EPA waste codes.
~~D001~~ ~~F~~
#N000

5. Physical form
LIQUID, OTHER BASED

: Percent solid
~~75.0~~ NA

: Volume to wt. (lb/gal)
11

6. Generation rates in kilograms.
Monthly maximum : Annual average : Max. amount stored : Max. days stored
2150 ~~3,900~~ 18,000 ~~26,400~~ ~~F~~ ~~9,900~~ ~~(e)~~ ~~90~~

7. DOT shipping name
~~WASTE FLAMMABLE LIQUID~~

: DOT hazard class : DOT ID code
~~FLAMMABLE LIQUID~~ ~~1993~~

8. Describe generation process.
~~PAINT SLUDGE FROM WATER WASH TOUCH-UP BOOTH THIS WASTE IS ABOUT 50% DRY PAINT, SCRAP PAINT AND 50% WASTE PAINT WHICH IS COLLECTED FROM THE PAINT BOOTH WALLS.~~ (.) Please key from #17 on next pg.

*** ANNUAL REPORT SECTION *** Lines 9-11.
If the waste was shipped off-site, also submit Annual Shipping Report for Hazardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes
(1)	16,300	~500 Kg	~300 Kg	D80

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

~~SEE NOTE (1)~~ Please key from #17 on next page

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

~~SEE NOTE (1)~~

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT

OFFICE CORRESPONDENCE TND 00-403 5853 5885

FROM	TO	DATE
	DSWM	L&C

DATE: September 17, 1987

TO: File

FROM: Tom Yates

SUBJECT: Tennsco Corp, Dickson Co., Variance for Plant I and II

At about 9:30 a.m. on September 11, 1987 I vistied Tennsco to see their solvent recovery operation. Mr. Ed Owens was my contact. This visit was at Plant I at 402 E. Broad. Tennsco manufacturers metal shelving and other metal office furnishing. When cleaning the paint equipment used to paint these products spent solvent is generated. The solvent is recovered by on-site distillation. Mr. Owens says they recover about two gallons of solvent from a drum of waste. The reason he gave for the low amount of solvent recovered relative to the amount of waste was the type paint they use and the large amount of solids in the spent solvent. The still and its operation is consistent with the variance information. They have requested a "Special Waste" classification for the still bottoms. The distillation unit for Plant II has not yet been installed. Mr. Owens said he would let me know when the Plant II distillation unit is operating.

TY/lag L/M #8

FROM	DATE

TO	

PH-0001
SR 3/77

DSWM L:C

PUBLIC NOTICE

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent flush solvent, Hazardous Waste Code D001, as generated at Tennsco Plant I, TND 004035853, 402 E. Broad in Dickson, Tennessee 37055, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Tennsco Corporation at their Plant 1 generates spent solvent in their painting process. The spent solvent is recovered on-site by a distillation process and reused as it was originally used. The on-site recovery and reuse of this hazardous waste will reduce the risk to health and environment associated with hazardous waste transportation and disposal.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. OCT 09 1987.

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contact: Division of Solid Waste Management Field Office, Tennessee Department of Health and Environment, Customs House, Room B-01, Nashville, TN 37219-5403; phone (615) 741-0654.

TY/ah/SW-154

DSWM LdC

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1535

TND 00-403-5853

May 30, 1995

Tennsco Corporation (Plant 1)
Attn: Mickey Self
PO Box 606
Dickson, TN 37055

Dear Mr. Self:

This letter is to inform you that your "variance from classification as a waste" has expired for the enclosed waste stream(s). If you are still generating this waste, you will need to update the information on the attached *Hazardous Waste Stream Report* so that our database remains current. The returned form, with any revisions, will serve as your official notification to the State on that waste, and as such, will require you to report on the waste stream in your Annual Report for 1995, which you will receive in January of 1996.

If we have not received the revised waste stream(s) by June 30, 1995, you will be considered a non-notifier and an inspection will be made by our field office. This could result in a Notice of Violation being written for possible enforcement action.

If you no longer generate this waste, please complete line 3 on the *Hazardous Waste Stream Report* under the heading "date no longer generated". Be certain the date is six digits (12-31-94, 09-11-94, etc.). Sign and date the back of the form (line 16) and send the corrected copy to my attention. The waste stream will then be closed out in our database (thereby requiring no more paperwork from you in subsequent years (unless you reopen the waste stream).

If you have any question, you may contact me at (615) 532-0887.

Sincerely,

Dennis Woodson

Dennis Woodson
Environmental Specialist
Waste Activity Audit

DBW

Enclosure(s)

PSum L:C

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility
   TENNSCO CORPORATION (PLANT 1)
   EPA identification code: TND 00-403-5853

2. Waste name. Use standard name from regulations whenever possible.
   FLUSH SOLVENT
   Waste Stream number: 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.
   1963
   Date no longer generated. (MM/DD/YY)
   6/10/92
   Frequency of generation (C)
   Continuous ____ Accidental/ One time ____ Various ____

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).
   AF
   EPA waste codes. (Primary first; six maximum.)
   D001
   SIC code for generating process.

5. Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	If used for fuel, BTU per pound
Liq-Othr (3)	10.0	.0	8.000	0.0	0.0

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
2,400.0	20,700.0	4,800.0	90

7. DOT shipping name	DOT hazard class	DOT ID code
WASTE FLAMMABLE LIQUID	Radioactive	1993

8. Describe generation process.

A SOLVENT MIXTURE OF 75% TOLUENE/25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINT EQUIPMENT. ADDITIONALLY SCRAP PAINT-OFF-SPEC-IS COLLECTED WITH THE FLUSH SOLVENT. WASTE IS A MIXTURE OF FLUSH SOLVENT FROM CLEANING AND OFF-SPEC. PAINT. WASTE IS PROCESSED IN AN ON-SITE SOLVENT RECOVERY UNIT.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )
	17		XX (V)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. TOLUENE	60	75
b. METHYL ISOBUTYL KETONE	20	25
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

UNDER VARIANCE WASTE IS RECYCLED IN SOLVENT RECOVERY UNIT ON-SITE.

RECEIVED JUN 16 1995 Solid & Hazardous Waste Div.

CN-0773 — Form Continues on the Back — RDA 2203 9(N)

DSWM L!C

HAZARDOUS WASTE FACILITY INSPECTION

SITE INSPECTED

Tenneco Corp.
TND 980545390
Plant 2
1st and Pickett St.
Dickson, Tennessee 37055

PRIMARY CONTACT

Mickey Self

INSPECTION DATE AND TIME

April 4, 1985
Starting at 9:00 a.m.

INSPECTOR AND REPORTER

Rob Gardner
701 Broadway, 8-01
Nashville, Tennessee 37219-5403
(615) 742-6649

OTHER INSPECTION PARTICIPANTS

None

PURPOSE OF INSPECTION

This routine full inspection was conducted to evaluate Tenneco's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

EVALUATION BASIS

Generator

FACILITY DESCRIPTION

One hazardous waste is generated at this location - flammable liquid D001 consisting of bad paints and paint equipment flush solvent. All waste is accumulated in 55-gallon drums and pumped into the transport tanker. Waste paint sludge from a high solids paint line has been evaluated and found to be non-hazardous. This waste is also sent to a secure landfill for disposal only because it can not be suitably handled at the local sanitary landfill. In the past all hazardous waste was shipped to Chem-fuel (IND000737510) on a manifest using Tenneco's Plant 1 identification number. A generator notification for this plant was made on 3/27/85.

At the time of inspection 80 to 90 drums of waste was on hand. Plans are being made to ship to RSR Chemical.

INSPECTION FINDINGS

The following violations of Rule 1200-1-11-.03 were found at the time of inspection:

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program, at a minimum be designed to ensure that employees are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems including where applicable; (1) procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) key parameters for automatic waste feed cut-off systems (if any); (3) communications or alarm systems; (4) response to fires or explosions; (5) response to ground-water contamination incidents; and (6) shutdown of operations. (0107)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management.

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste. (0135)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains training records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator designs his contingency plan to minimize hazards to public health or the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. (0157)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the actions employees must take to immediately respond to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the accumulation area(s). (0165)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordiantor is on call) will immediately; activate internal alarms or communication systems, where applicable, to notify all other affected employees; and notify appropriate State of local agencies with designated response roles if their help is needed. (0166)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is a release, fire, or explosion the emergency coordinator will immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records and if necessary, by chemical analysis. (0167)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will concurrently assess possible hazards to public health or the environment that may result from a release, fire, or explosion. This assessment must consider both direct and indirect effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. (0168)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will immediately notify appropriate local authorities and the Tennessee Emergency Management Agency, if he determines that the facility has had a release, fire, or explosion which could threaten public health or the environment outside the facility, and then be available to help the appropriate officials decide whether local areas should be evacuated. (0169)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, collecting and containing released waste, and removing or isolating containers. (0171)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s); no waste that may be incompatible with the released material is stored in the accumulation area until clean-up procedures are completed; and all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have been completed and all emergency equipment has been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulation area(s). (0175)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, wihtin 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, as appropriate for the type of waste handled at the accumulation area and the potential need for the services of these organizations. (0177)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists the names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator and keep this list up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. (0185)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a brief outline of the capabilities of each item on the list of emergency equipment at the accumulation area (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where thisequipment is required. (0197)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes an evacuation plan for employees where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes, (in cases where the primary routes could be blocked by releases of hazardous waste or fire). (0205)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains a copy of the contingency plan and all revisions to the plan and submits them to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. (0207)

Rule 1200-1-11-.03(4)(b)1(i) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator, if the waste is stored in containers, ensures that containers holding hazardous waste are always kept closed during storage, except when it is necessary to add or remove waste. (0447)

Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

Rule 1200-1-11-.03(4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste is being accumulated on-site each container and tank is labeled or marked clearly with the words "HAZARDOUS WASTE". (0525)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator accumulates the hazardous waste in a manner which will minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten public health or the environment. (0535)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the accumulation area(s) is equipped with a devise, such as a telephone (immediately available at the scene of accumulation) or a hand-held two way radio, capable of summoning emergency assistance from local police departments, fire departments, or State and local emergency response teams, unless none of the hazards posed by the waste accumulated warrent this kind of equipment. (0555)

Rule 1200-1-11-.07(1)(b)1(i) prohibits a new hazardous waste management facility, in Tennessee, from treating, storing or disposing of hazardous waste unless the owner or operator has a permit under the Tennessee Hazardous Waste Management Act. (3500) Waste on hand had been stored more than 90 days.

SIGNED: Bob Barton DATE: 4-12-85

DSWM L+C

PUBLIC NOTICE

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent flush solvent, Hazardous Waste Code D001, as generated at Tennsco, Plant 2, TND 980845390, corner of 1st Street and Pickett in Dickson, Tennessee 37055, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Tennsco Corporation at their Plant 2 generates spent solvent in their painting process. The spent solvent is recovered on-site by a distillation process and reused as it was originally used. The on-site recovery and reuse of this hazardous waste will reduce the risk to health and environment associated with hazardous waste transportation and disposal.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. OCT 12 1987.

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contact: Division of Solid Waste Management Field Office, Tennessee Department of Health and Environment, Customs House, Room B-01, Nashville, TN 37219-5403; phone (615) 741-0654.

TY/ah/SW-154

DSWM L&C

INSPECTION REPORT

SITE/OPERATION INSPECTED:

Tennsco Corporation - Plant II & III
TND 98 084 5320
P.O. Box 606
Dickson, TN 37055

OWNER/OPERATOR/PRIMARY CONTACT:

Micky Self
446-8035

DATE AND TIME OF INSPECTION:

November [illegible], 1987
9:00 a.m.

REPORT PREPARED BY:

Tom Golden
701 Broadway, L & C
Nashville, TN [illegible]
(615) [illegible]

NAMES AND AFFILIATIONS OF OTHER INSPECTION PARTICIPANTS:

None

PURPOSE OF INSPECTION:

This routine, unscheduled inspection was conducted to evaluate Tennsco's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

FACILITY DESCRIPTION:

Tennsco Plant II and III manufactures office cabinets. The hazardous waste generated at these plant is a D001 waste solvent. Tennsco has a variance for the recovery of the solvent of this waste.

INSPECTION FINDINGS:

No violations were apparent during the inspection. All the conditions of the variance were met at the time of the inspection.

Tom Golden
Tom Golden

December 8, 1987

~See full instructions for form PH-2022 for additional information DSWM-LEC

(1989)

1. Organization's name.
TENNSCO CORPORATION (PLANT 1)

VARIANCE GRANTED
DURING 1987

| EPA ID CODE
TND 00-403-5853

2. Waste name.
FLUSH SOLVENT

| Waste stream ID
1

3. Give years waste generated | Date stopped | Frequency of generation
1963 / / CONTINUOUS

4. Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| AF |~~F005~~ D001 |

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 010.0| |0008.000 | |

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
2,400 20,700 4,800 5 ~~90~~

7. DOT shipping name | DOT hazard class | DOT ID code
WASTE FLAMMABLE LIQUID FLAMMABLE LIQUID 1993

8. Describe generation process. ~~FLUSH AND CLEAN THINS SOLVENT ... COLLECTED WITH THE FLUSH SOLVENT~~ WASTE IS A MIXTURE OF FLUSH SOLVENT FROM CLEANING AND OFF-SPEC. PAINT. WASTE IS PROCESSED IN AN ON-SITE SOLVENT RECOVERY UNIT.

** ANNUAL REPORT SECTION ** LINES 9-11

9.

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	29,500	~200	~200

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	25,319	(Y) N	H09
B	4181	Y (N)	T54
C	BALANCE MANAGED	Y N	
D	UNDER VARIANCE	Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) d. Substituting raw materials d( )
b. In process recycling. . . . . . . b( ) e. Improved operations. . . . e( )
c. Equipment/technology modification c( ) f. No effort. . . . . f(
g. Other - explain below: . . . . . . g( )
N/A-VARIANCE GRANTED

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of Reduction (kg)
N/A-VARIANCE GRANTED.

Hazardous Waste Stream Report - Front DEC 31, 198

)ee full instructions for form PH-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
TENNSCO CORPORATION (PLANT 1) TND 00-403-5853

2. Waste name. NON HAZARDOUS WASTE | Waste stream ID
WASTE PAINT (1) DROP FROM LISTING. 2

3. Give years waste generated | Date stopped | Frequency of generation
1963 / / CONTINUOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES | A | N000 |

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 075.0 | | 0011.000 | |

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
2,150 18,000 1 1

7. DOT shipping name | DOT hazard class | DOT ID code
WASTE FLAMMABLE LIQUID FLAMMABLE LIQUID 1993

8. Describe generation process.
THIS MATERIAL ORIGINATED FROM THE WALLS OF THE PAINT BOOTHS AND RESULTS FROM HIGH SOLIDS PAINTS BEING SPRAYED. PREVIOUSLY THIS MATERIAL WAS MANAGED AS A HAZARDOUS WASTE BECAUSE OFF-GRADE PAINT WAS MIXED WITH THIS WASTE. THE ATTACHED LAB ANALYSES VERIFY MATERIAL TO BE NON-HAZARDOUS.

** ANNUAL REPORT SECTION ** LINES 9-11

9.

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987			

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A		Y N	
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . . . b( ) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(

g. Other - explain below: . . . . g( )

RECEIVED
19 1988
DIV.

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of Reduction (kg)

1987 Annual Shipping Report for Hazardous Waste Generators

(For wastes shipped off-site only.)

Page 1 of 1

EPA ID CODE TND 98-084-5392
TENNSCO CORPORATION (PLANT 283)
MICKEY SELF
PO BOX 6 5
DICKSON TN 37 55

Please complete and return this form to following address:

Tennessee Department of Health and Environment
Division of Solid Waste Management
Customs House, Fourth Floor
701 Broadway
Nashville, Tennessee 37219-5403

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

RECEIVED FEB 19 1988 DIV. OF SWM

2. Waste stream numbers.	DOT Shipping Name / Waste name	EPA Waste codes	Amount shipped in kilograms	Number of shipments	TSDF EPA ID number	Transporter EPA ID number	TSDF Handling codes
a. 1	WASTE FLAMMBLG LIQ. FLUSH SOLVENT	D001	7131	1	ALD 094476793	ALD 094476793	T50
b.							
c.							
d.							
e.							
f.							
g.							
h.							
i.							

3. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

X Mickey Self Purchasing Agent 2-18-88

DSWM 2.3

DSWM L&C

Hazardous Waste Notification Summary

JAN 06, 1989

See full instructions for Form PH-2019A for additional information and codes.

1. Organization's name
TENNSCO CORPORATION (PLANT 283) | EPA ID CODE TND 98-084-5390

2. Mailing address
PO BOX 606 | City DICKSON JAN 27 1989 | State TN | Zip 37055

3. Physical location or address
1ST & PICKETT ST | County name DICKSON

Latitude .0000 | Longitude .0000

4. Owner name
LESTER D SPEYER | Phone (615) 446-8000

5. MANAGER OR operator name
ROY STINSON | Phone (615) 446-8000

6. Principal technical contact
MICKEY SELF | Phone (615) 446-8000

7. Number of employees 187 | Year began 1980 | SIC codes 2542, , , | Job shop NO

8. Emergency contacts

	Name	Time period covered	Phone
A	ROY STINSON	HOME	(615)446-3471
B	JEWELL LOGGINS	HOME	(615)446-4564
C	LARRY DUNN	HOME	(615)446-9432
D	MICKEY SELF	HOME	(615)769-5618

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. If a range of related permits, summarize by giving the first and last permit number.
994299P, 994300P, 994302P, AND 994303P

10. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date

Mickey B Self EXECUTIVE ASST 2-22-89

Below is for Department use only.

11. Date rcvd 2-23-89 | County 22 | Priority | Generator Yes (No) | Small Gen. Yes (No) | Special status

12. Date closed /00/00 | Date regulated /00/00 | Date deregulated /00/00 | Insp. Freq. 2

13. Comments

RECEIVED
FEB 23 1989
DIV OF SWM

Hazardous Waste Stream Report - Front JAN 06, 1989

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
TENNSCO CORPORATION (PLANT 283) | EPA ID CODE TND 98-084-5390

2. Waste name.
FLAMMABLE LIQUID | Waste stream ID (1)

3. Give years waste generated (SINCE 1980) 4 YEARS | Date stopped /00/00 | Frequency of generation CONTINUOUS

4. Mark all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f)

CODES	EPA waste codes	SIC
A	D001	2542

5.

Physical form	% Solid	% Water	Lb./gal.	Chlorine PPM	BTU/lb.
LIQUID, OTHER BASED	75.0		.000	.0	.0

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
728	4,368	2,184	90

7. DOT shipping name
FLAMMABLE LIQUID | DOT hazard class FLAMMABLE LIQUID | DOT ID code 1993

8. Describe generation process.
BAD PAINT AND PAINT THINNER MIXED FOR PAINT EQUIPMENT CLEAN-UP.

** ANNUAL REPORT SECTION ** LINES 9-11

9.

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1988	0	0	0

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	0	Y N	
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification c( )
d. Substituting raw materials d( )
e. Improved operations. . . . e( )
f. No effort. . . . . f( )
g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt. of Reduction (kg)

Hazardous Waste Stream Report - Back JAN 06, 1989

See full instructions for form PH-2022 for additional information and codes.

Organization's name.
TENNSCO CORPORATION (PLANT 2E3) | EPA ID CODE TND 98-084-5390

Waste name.
FLAMMABLE LIQUID | Waste stream ID (1)

12. Chemical Characteristics.
pH | Flash point | Reactive code | Concentration units. For EP toxic wastes, indicate PPM.

Major and hazardous consituents. | lower | upper

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

THIS WASTE IS NO LONGER GENERATED. MATERIALS ARE HANDLED IN AN ON SITE SOLVENT RECOVERY UNIT COVERED BY A VARIANCE.

16. I certify that this information is true, accurate and complete.
SIGNATURE (Generator or authorized representative), title and date.

Michael Self EXECTIVE ASST. 2-22-89

Below is for department use only.

17. Date rcvd | Complete? | Test results? | Reasonable? | Follow-up | Initials

2-23-89 | Yes (No) | Yes (No) | (Yes) No | Yes (No) | ZLS

Status | Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastse (R).

Status 89 | Report N

18. Comments.

Variance granted Oct. 1987
Sill Bottoms given Special Waste approval by Nashville Field Office March 1987

RECEIVED
FEB 23 1989
DIV OF SWM

Data File

1988 Annual Shipping Report for Hazardous Waste Generators

(For wastes shipped off-site only.)

Page 1 of 1

EPA ID CODE TND 98-084-5390 Y- -h
TENNSCO CORPORATION (PLANT 2&3)
MICKEY SELF
PO BOX 606
DICKSON TN 37055

Please complete and return this form to following address:

Tennessee Department of Health and Environment
Division of Solid Waste Management
Customs House, Fourth Floor
701 Broadway
Nashville, Tennessee 37219-5403

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste stream numbers.	Dot Shipping Name / Waste name	EPA Waste codes	Amount shipped in kilograms	Number of shipments	TSDF EPA ID number	Transporter EPA ID number	TSDF Handling codes
a.							
b.	NO HAZ. WASTE SHIPMENTS MADE IN 1988						
c.							
d.							
e.							
f.							
g.							
h.							
i.							

3. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Mickey Self EXECTIVE ASST 2-22-89

EPA Form [illegible] (Rev. 12/87)

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Health and Environment, Division of Solid Waste Management, Customs House - Fourth Floor, 701 Broadway, Nashville, Tennessee 37219-5403

1. Organization's full, legal name: TENNSCO CORPORATION, PLANT 2/3
   EPA identification code: TND 980845390
2. Mailing address: P.O. BOX 606 | City: DICKSON | State abbrev.: TN | ZIP code: 37055
3. a. Physical location or address: FIRST & PICKETT STS. | County name: DICKSON
   b. Latitude (degrees, minutes & seconds): 36.0500 | Longitude (degrees, minutes & seconds): 87.2405
4. Owner name: LESTER SPEYER | Phone with area code: (615) 446-8000
5. Manager or operator name: MICKEY SELF | Phone with area code: (615) 446-8000
6. Principal technical contact: MICKEY SELF | Phone with area code: (615) 446-8000
7. Number of employees: 300+ | Year operation began: ~1958 | SIC codes (Primary SIC first, etc.): 2542 | Job shop: Yes (No)
8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	MICKEY SELF	ALL TIMES	446-8000
b.			
c.			
d.			

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.
   AIR PERMITS FOR COATING APPLICATION & CITY WASTE WATER DISCHARGE.
10. Certify that the information given in this document is true, accurate and complete by signing and dating.
    Signature of authorized representative: Mickey Self | Title: Purchasing Agent | Date: 12-19-90
11. Below is for Department use only

Date received	County code	Priority	Generator	Small Generator	Special status
122090	22		Yes (No)	Yes (No)	

12. Date closed | Date regulated | Date unregulated | Inspection frequency: Annual (A), FY88+2n (1), FY89+2n (2).
13. Comments

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility: TENNSCO CORPORATION
   EPA identification code: TND 980845390
2. Waste name. Use standard name from regulations whenever possible: WASTE/SCRAP PAINT-LIQUID
   Waste Stream number: 1
3. Give the years that this waste has been generated, e.g. 1975, 1982-: 1990 - 0
   Date no longer generated. (MM/DD/YY):
   Frequency of generation: Continuous / Accidental/ One time / Various
4. Circle all appropriate hazard criteria below. Ignitable (d), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f).
   EPA waste codes. (Primary first): D001/F003/F005
   SIC code for generating process: 2542
5. Physical form: (2) LIQUID 3
   Percent solid: 50 %
   water: 0 %
   Vol. to wt. conversion (pounds per gallon): 10
   If used for fuel, chlorine content: N/A PPM
   BTU per pound: N/A /lb.
6. Generation rates. Supply all rates in kilograms.
   Monthly Maximum: (1) 12,750. (kg)
   Annual average: — (kg)
   Maximum amount stored on site: (kg)
   Maximum days stored: N/A
7. DOT shipping name: WASTE FLAMMABLE LIQUID
   DOT hazard class: FLAMMABLE LIQ 07
   DOT ID code: UN 1993
8. Describe generation process.

(1) THIS ONE TIME GENERATION IS TO DISPOSE OF PAINT RAW MATERIALS DUE TO A PROCESS SHUTDOWN USING THIS PAINT.

ANNUAL REPORT SECTION Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off site, also submit Annual Shipping Report for hazardous waste generators. For handling in a permitted facility, use "T", "S", or "D" codes from instructions. For other handling, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on site on first day of year (kg)	Amount on site on last day of year (kg)

	Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods
a			
b			
c			
d			

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.
    a. Reformulation/redesign of product . . . a( )
    b. In process recycling . . . . . b( )
    c. Equipment/technology modification . c( )
    d. Substituting raw materials . . . . d( )
    e. Improved operations . . . . . e( )
    f. No effort . . . . . f( )
    g. Other - explain below . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to the previous year.
    a. Increased toxicity-a( ), b. decreased toxicity-b( ), c. No change-c( ).
    Amount of Reduction (kg)

PH-2022(SHW 11/87 Rev.)

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility.

TENNSCO CORPORATION

EPA identification code: TND 980845390

2. Waste name. Use standard name from regulations whenever possible.

WASTE PAINT - SOLID

Waste Stream number: 2

3. Give the years that this waste has been generated, e.g. 1975, 1982-.

① 0-1990

Date no longer generated. (MM/DD/YY)

Frequency of generation: Continuous / Accidental/ One time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f).

EPA waste codes. (Primary first): D001 / F003 / F005

SIC code for generating process: 2542

5. Physical form: SOLID

Percent solid: ~100 %; water: - %

Vol. to wt. conversion (pounds per gallon): 10

If used for fuel, chlorine content: N/A PPM; BTU per pound: N/A /lb.

6. Generation rates. Supply all rates in kilograms.

Monthly maximum: 8273. (kg)

Annual average: — (kg)

Maximum amount stored on site: — (kg)

Maximum days stored: N/A

7. DOT shipping name: SOLID HAZ WASTE N.O.S.

DOT hazard class:

DOT ID code: UN 1993

8. Describe generation process.

① THIS ONE TIME GENERATION IS TO DISPOSE OF PAINT RELATED RAW MATERIALS DUE TO A PROCESS SHUTDOWN USING THESE MATERIALS.

ANNUAL REPORT SECTION Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off site, also submit Annual Shipping Report for hazardous waste generators. For handling in a permitted facility, use "T", "S", or "D" codes from instructions. For other handling, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on site on first day of year (kg)	Amount on site on last day of year (kg)

	Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods
a			
b			
c			
d			

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

a. Reformulation/redesign of product . a( )
b. In process recycling . . . . . b( )
c. Equipment/technology modification . c( )
d. Substituting raw materials . . . .d( )
e. Improved operations. . . . . .e( )
f. No effort. . . . . .f( )
g. Other - explain below. . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to the previous year.

a. Increased toxicity-a( ). b. decreased toxicity-b( ), c. No change-c( ).

Amount of Reduction (kg)

PH-2022(SHW 11/87 Rev.)

TND 98-084-5390 22-40

TND 98-084-5390

T G 12 Nco

SNS 12/8

DEC 07 1992

DSWM

L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
537 BRICK CHURCH PARK DRIVE
NASHVILLE, TENNESSEE 37243-1550

December 2, 1992

Mr. Mickey Self
Tennsco Corporation
201 Tennsco Drive
P. O. Box 606
Dickson, Tennessee 37055-0606

Re: Drum dump site on Tennsco Property (behind former Winner Boat Plant)

Dear Mr. Self:

On December 1, 1992 Jim Cornwell and I met with you and Tennsco staff where we inspected the drum dump site on Tennsco property behind the former Winner Boat Plant. We observed discolored soil and deteriorated barrels, many of which contained a hardened resin, in two (2) cells which are located some 300' behind the building. One cell had been partially disturbed, but you informed me that no waste had been removed.

The Division of Solid Waste Management requires that certain precautions be taken during the remediation process. As waste is removed from the cells, and different waste types are encountered, separate staging or holding areas are required prior to running analysis. If indeed, there is more than one (1) waste type, then representative sampling can easily be performed on each waste type to determine if it is hazardous. Also, after the waste is totally removed from the cells, soil samples must be taken on the bottom of the cells to assure that a proper closure has been achieved. If soil discoloration is visible in certain areas after removal of the waste, a TCLP as well as a total analysis would be in order.

After this is done, please contact me for a follow-up inspection of the site. Also, after re-inspecting the site and reviewing all analytical data, the Division will consider your request for a special waste permit.

If there are any questions please contact me at (615) 741-0654.

Sincerely,

Wayne Harbin

Wayne Harbin
Division of Solid Waste Management

DWH/fp

DSWM L&C

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete entire report, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility.
   TEXTRON CORPORATION PLANT 2/3
   EPA identification code: TND 98-484-3590

2. Waste name. Use standard name from regulations whenever possible.
   FLAMMABLE LIQUID
   Waste Stream number: 503

3. Give the years that this waste has been generated, e.g. 1975, 1982-.
   (SINCE 1990) 4 YEARS
   Date no longer generated. MM/DD/YY: 01-04-93
   Frequency of generation (C): Continuous ___ Accidental/ One Time ___ Various ___

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g), N
   EPA waste codes. (Primary first; six maximum.): D001
   SIC code for generating process.

5. Physical form: Liquid (L) | % Solid: 75.0 | % Water: .0 | Vol. to wt. conversion (pounds/gallon): 8.000 | If used for fuel, chlorine content (PPM): 0.0 | BTU per pound: 0.0

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): 708.0
   Annual average (kg): 4,368.0
   Maximum amount stored on-site (kg): 2,184.0
   Maximum days stored: 90

7. DOT shipping name: FLAMMABLE LIQUID
   DOT hazard class: Flam. liquid | OT
   DOT ID code: 1993

8. Describe generation process.
   END PAINT AND PAINT THINNER MIXED FOR PAINT EQUIPMENT CLEAN-UP.

DELETE THIS STREAM

9. Chemical Characteristics.
   pH | Flash point | Reactive code | Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a.		
b.		
c.		
d.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

RECEIVED
FEB 17 1994
Solid & Hazardous Waste

TND 98-084-5392

DSWM L&C

LIQUID WASTE PAINT STREAM #4

11. Annual Generation and Handling Data: If the waste was shipped offsite, summarize in block (a) and submit an Offsite Shipping Report. Report onsite handling in blocks (b) - (d). For offsite or onsite handling that requires interim status or a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

Report Year 1994	Amount generated during year (kg)	Amount onsite in temporary storage on the first day of year (kg)	Amount onsite in temporary storage on the last day of year (kg)
	~~60,909~~ 103,636.	0	0

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
a	~~60,909~~ 103,636.	S01/T50	b	—	—
c	Amount Handled ONsite —	TSDR handling/Waste management methods —	d	Amount Handled ONsite —	TSDR handling/Waste management methods —

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
(1)	(1)	(1)	(1)

13. Check the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods.

a. Reformulation/redesign of product . (a)
b. In process recycling. . . . . (b ✓)
c. Equipment/technology modification . (c ✓)
d. Substituting raw materials . . . . . (d)
e. Improved operations . . . . (e)
f. Reduction research/planning . . . . . .(r)
g. No effort . . . .(f)
h. Other - briefly explain here. . . . . .(g)

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

a. Training or technical assistance.....a(No NA (Yes))
b. Technical feasibility.................b(No (NA) Yes)
c. Economic practicality.................c(No (NA) Yes)
d. Measurement/accounting methods........d(No (NA) Yes)
e. TN hazardous waste regulations........e(No (NA) Yes)
f. Implementation experience.............f(No (NA) Yes)
g. High costs of haz. waste mgt....g(No (NA) Yes)
h. Accidental generation...........h(No (NA) Yes)
i. Other - describe here:..........i(No (NA) Yes)

15. Narrative: provide additional explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

COMPANY IS MOVING FROM HIGH SOLIDS PAINT TO POWDER COATING AT THIS FACILITY. PLANS ARE TO HAVE POWDER IN OPERATION BY FALL, 1995. THIS WILL NEARLY ELIMINATE H.W. GENERATION.

(1) DURING 1994 A SPECIAL EFFORT WAS MADE TO PUSH MORE WASTE PAINT INTO THE RECYCLABLE MATERIAL STREAM. PRODUCTION WAS UP ABOUT 10% OVER 1993 WHILE WASTE GENERATION WAS ~~DOWN ABOUT 15% OR A NET REDUCTION OF 25% IN WASTE GENERATION.~~

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
Mike [signature]	MBR Exec Asst	2-2-95

Below is for Department use only.

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Follow up	Initials
02-07-1995	(Yes) No	Yes (No)	(Yes) No	Yes (No)	DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R); Corrective Action (C); Waste water Rx (W).	Status	Further Reporting Y N

18. Comments.

RECEIVED

FEB 14 1995

DIV. OF Solid & Haz. [illegible]

1994 Offsite Shippir Report

For wastes shipped offsite only

Page 1 of 1

D 98-084-5390 TN - Nashville

NASCO CORPORATION PLANT 2/3
ttn: MICKEY SELF
BOX 606
EKSON, TN 37055

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also complete this form when terminating business.
For technical assistance, call 1 (800) 237 7018 in Tennessee only

2. Waste Stream or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDF Destination Facility EPA ID Number	Transporter EPA ID Number	TSDF Handling Codes
a 4	LIQUID WASTE PAINT	D001, F003, F005	21,591 ~~18,182~~	~~2~~ 3	TND 98-192-0119	TND 98-192-0119	S01, ~~T50~~
b 4	LIQUID WASTE PAINT	D001 F003 F005	63,863 ~~42,727~~	~~5~~ 7	TND 98-192-0119	ALD 09-447-6793	S01, ~~T50~~
c 5	SOLID PAINT WASTE	D001 F003 F005	9545	2	TND 98-192-0119	TND 98-192-0119	S01, ~~T50~~
d 5	" " "	" " "	60,000	5	TND 98-192-0119	ALD 09-447-6793	S01, ~~T50~~
e 4	LIQUID WASTE PAINT	D001 F003 F005	18,182	1	ALD070513767	ALD070513767	S01, T50
f 5	SOLID PAINT WASTE	D001 F003 F005	26,136.	3	ALD094476793	TND981920119	S01, T50
g 5	SOLID PAINT WASTE	" " "	7955	1	TND981920119	TND981920119	S01, ~~T50~~

3. Totals: Sum the two columns to the right.
Page totals: sum the following two columns
Final totals: sum all page totals on last page of report

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Mickey B Self Exec. Assistant 2-2-95
KMBL REVISED 2-8-95

CN-0779 RDA 2203

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street; Nashville, TN 37243-1535

DSWM
L&C

If data is incorrect, please change, certify and return. Retain a copy of any changes.

1. Company's full, legal name: [illegible] CORPORATION PLANT 2/3			EPA identification code: TND 98-08[illegible]-5390	
2. Mailing address: PO BOX [illegible]	City: DICKSON	State: TN	Zip code: 37055	
3. a. Site address: FIRST & PECKETT STS	City:	State:	Zip code:	County name: Dickson
b. Latitude (degrees, minutes & seconds): [illegible]	Longitude (degrees, minutes & seconds): 87.2409			
4. Owner name (may be corporation or company name): LESTER SPEYER		Type:	Phone with area code: (615) 446-8000	
5. Manager or operator name: MICKEY SELF		Type:	Phone with area code: (615) 446-8000	
6. Principal technical contact: MICKEY SELF	FAX number with area code:		Phone with area code: (615) 446-8000	
7. Number of employees: 300	Year operation began: 1956	SIC codes (Primary SIC first, etc.): 2542, , ,	Job shop: Yes No (N)	

8. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a. MICKEY SELF	ALL TIMES	(615) 446-8000
b. [illegible] STINSON	ALL TIMES	(615) 446-4564
c.	HOME	(615) 446-9432
d.	HOME	(615) 789-5618

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Mickey B Self	Exec. Asst	1-31-96

*** Items 11-13 for Department use only ***

11. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
02-06-1996	[illegible]		Y	N	

12. Date closed	TSDF status	Transporter status	

13. Comments

CN-[illegible] (Rev. 11/95) RDA 2203

RECEIVED
FEB 06 1996
Div. of
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: [illegible] CORPORATION PLANT 273	EPA identification code: TND 98-084-5390
2. Waste name. Use standard name from regulations whenever possible. [illegible] WASTE PAINT	WASTE STREAM NUMBER: 4

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1992	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation: Continuous ____ Accidental/ One time ____ Various (V)
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g). g	EPA waste codes. (Primary first; six maximum.) D001, F003, F005	SIC code for generating process. 2542,

5. Physical form code: [illegible] (L)	% Solid: 30	% Water:	Vol. to wt. conversion (pounds/gallon): 10.000	If used for fuel, chlorine content (PPM): 0.0	BTU per pound: ~~0~~ 11,500

6. Generation rates in kilograms. Monthly maximum (kg): 55,000.0	Annual average (kg): 30,000.0	Maximum stored onsite (kg): 50,000.0	Maximum days stored: 90

7. DOT shipping name: [illegible] FLAMMABLE LIQUID	DOT hazard class: ORM-D	10	DOT ID code: UN1993

8. Describe the generation process.

COLLECTED AND TEMPORARILY STORED IN 55 GALLON DRUMS. (1) VARIES TO NO GENERATION

9. Chemical Characteristics			Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume( ), % weight( ), PPM( )
pH	Flash point: 145F	Reactive code	

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a.		
b.		
c.		
d.		
e.		

10. Describe how you have managed or intend to manage this waste *through final disposition.* Use the Waste Management Method Codes on page 6 of the instructions.

T50

RECEIVED
FEB 06 1995

Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility	EPA identification code
TENNECO CORPORATION PLANT 2/3	TND 98-084-5390

2. Waste name. Use standard name from regulations whenever possible.	WASTE STREAM NUMBER
WASTE PAINT SOLID	5

3. Give the years that this waste has been generated, e.g. 1975, 1982.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1992		Continuous Accidental/ One time Various (1)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
	D001, F003, F005	2542,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
SOLID (9)	1 + 1		10.000	0.0	~~0.0~~ 12,500.

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
20,000.0	65,000.0	50,000.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
WASTE FLAMMABLE SOLID	Explosives	01	

8. Describe the generation process.

9. Chemical Characteristics.

pH	Flash point (°F)	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
	140F		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

T50

RECEIVED
FEB 08 1996
Div. of Solid & Hazardous Waste Mgt.

CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203

1995 Offsite Shipping Report

Page 1 of 1

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when eliminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

Waste Stream "#"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDF Destination Facility EPA ID Number	Transporter EPA ID Number	TSDF Handling Codes
4	LIQUID WASTE PAINT	D001 F003 F005	129,500.	7	ALD 07-051-3767	ALD 07-051-3767	S01, T50
4	LIQUID WASTE PAINT	D001 F003 F005	3,000.	1	ALD 98-102-0894	ALD 98-102-0894	S01, T50
5	SOLID WASTE PAINT	D001 F003 F005	6 000	1	ALD 98-102-0894	ALD 98-102-0894	S01, T50

Note: Sum the two columns to the right.
Page totals: sum the following two columns
Final totals: sum all page totals on last page of report

137,500	9

Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Exec. Asst 1-31-96

RDA 2203

FEB 06

DSWM L&C

RCRA Inspection Report

Inspector and Author of Report

Tom Yates, Environmental Specialist

Facility Information

Tennsco Plant 2/3
PO Box 606
First & Pickert Street
Dickson Tennessee 37056
TND 98-004-5390
(615) 446-8000

Responsible Official

Mickey B. Self

Inspection Participants

Ed Owens, Tennsco
Woody Adams, Tennsco

Date and Time of Inspection

February 7, 1996
Approximately 8:30 a.m.

Applicable Regulations

Tennessee's Hazardous Waste Management Regulations (Tennessee Rule Chapter 1200-1-11)

Purpose of Inspection

To conduct an unannounced hazardous waste generator compliance evaluation inspection to determine Tennsco's compliance status with Tennessee's Hazardous Waste Management Regulations.

Facility Description

Tennsco manufactures metal welded cabinets, lockers, shop equipment and filing cabinets. Tennsco was originally Diebold Company and began operation in 1958. In January 1962, Diebold sold the company and it became Tennsco. Tennsco is comprised of six separate facilities located in Dickson and employs approximately 300 people. Plant 2/3, the object of this inspection, consists of two buildings located on one continuos site and is considered one facility, has one EPA identification number, and is referred to as Plant 2/3 to acknowledge that there are two production buildings on the site. The Plant 2/3 buildings were acquired in 1980 and production began around that time. The production processes

used at Plant 2/3 include stamping, welding, shaping and painting. The hazardous wastes are generated from the painting processes. The paint processes used in Plant 2 of the Plant 2/3 facility include electrostatic spray paint booths, hand spray areas, and robotics spray areas. The paint processes used at Plant 3 of the Plant 2/3 facility include an electrostatic disk system, a hand spray area and a high solids baking enamel paint. A new powder paint system is being installed and expected to be operating in the near future. Tennsco anticipates a significant hazardous waste reduction to result from the change to the powder paint system. Paint waste from overspray and waste from cleaning paint equipment are the hazardous waste generated from the painting processes. Drums used for satellite accumulation of these hazardous wastes are located near the painting equipment. When possible, paint wastes are reused by blending with new paint. Waste not reused is shipped off site as hazardous waste. A review of the annual report data submitted in 1995 shows Tennsco Plant 2/3 generated over 1000 kg of hazardous waste per month for 12 months in 1994. A review of the manifest shows M & M Chemical and Equipment Company and Fisher Industrial Services were used for transportation, treatment and/or disposal of their hazardous waste.

A small amount of waste oil is generated from equipment maintenance. This is handled by Industrial Oil Service and M & M Chemical and Equipment Company.

Findings

The following violations were noted during this inspection:

Rule 1200-1-11-.03(4)(e)

2. Except as provided in parts 6, 7 and 8 of this subparagraph, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:

(ii) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

(iii) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste".

The main hazardous waste accumulation area where hazardous waste is accumulated prior to off-site shipment was found to have, based on Mr. Self's and my count, 36 drums containing hazardous waste which had no labels, hazardous waste markings and were not marked with the required accumulation date. This violation is considered high priority and subject to continued enforcement action irrespective of the correction date given in the accompanying Notice of Violation.

Take the necessary steps to see that all drums and containers of hazardous waste are always properly marked, labeled and dated.

Rule 1200-1-11-.05(3)

(c) Required Equipment - All facilities must be equipped with the following, unless none of the hazardous posed by waste handled at the facility could require a particular kind of equipment specified below:

1. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;

2. A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police department, fire department, or State of local emergency response teams;

3. Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

The main hazardous waste accumulation and storage area between the fabricating building and paint storage building did not have an alarm or emergency communication system immediately available at the scene of operations and adequate spill control equipment was not provided.

If a phone or similar devise is used for emergency communication it should be located near enough to the accumulation area to be immediately available. If a two-way radio system is used a definite procedure for its use should be established to insure it will be effective and in good working condition if needed. This procedure should be demonstrable at inspections.

Rule 1200-1-11-.05(3)

(f) Required Aisle Space - The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Aisle space for unobstructed movement of emergency equipment was not provided in the hazardous waste accumulation area.

The hazardous waste drums and containers in the accumulation area should be organized and maintained so that there is adequate aisle space for unobstructed access by emergency equipment and so labels, markings, etc., are clearly visible. A definite area or space where hazardous waste containers will be placed should be designated. Signs, painted lines, fences and similar items are useful in accomplishing this.

Rule 1200-1-11-.05(9)

(e) Inspections - The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

Weekly inspections of hazardous waste containers and the hazardous waste accumulation area and a log of these inspections was not done.

Inspect the hazardous waste accumulation area and containers at least once a week and maintain a log which will at least include date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions.

Rule 1200-1-11-.03(4)(e)

5. (i) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste listed in Rule 1200-1-11-.02(4)(b), (c), or (d)5 in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with part 2 of this subparagraph provided he:

(II) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Satellite containers used for the accumulation of hazardous waste near the point of generation were not marked "Hazardous Waste".

Mark all containers used to accumulate and/or collect hazardous waste with the words "Hazardous Waste".

The contingency plan that was reviewed at this inspection was dated March 1993. It is recommended this plan be reviewed and up dated as needed. A record of this review should be attached to the plan.

The Waste Reduction Act of 1990 requires that an annual progress report be completed which shall:

(1) Analyze and quantify progress made, if any, in hazardous waste reduction, relative to each performance goal established under Section 305(b); and

(2) Set forth amendments, if needed, to the hazardous waste reduction plan and explain the need for the amendments.

Complete a waste reduction progress report which includes the above information.

I appreciate the time and cooperation I was given during my inspection. If there are any questions regarding this report contact Tom Yates at (615) 299-9922.

Signed

Tom Yates

Name of Inspector

Feb. 12, 1996

Date

TDY/Tenn188A/db

cc: Solid Waste Management Central Office
U.S.E.P.A. -- Region IV

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

1/9/97

DSWM L&C

IN THE MATTER OF:	)	
	)	
TENNSCO CORP.	)	**DIVISION OF SOLID WASTE MANAGEMENT**
	)	
	)	**SWM CASE NO. 96-H0023**
RESPONDENT	)	

ORDER AND ASSESSMENT

Comes now, Justin P. Wilson, Commissioner of the Department of Environment and Conservation, and states that:

PARTIES

I.

Justin P. Wilson is the Commissioner of the Tennessee Department of Environment and Conservation, (the 'Department') and among other duties and responsibilities, is charged with the responsibility for administering and enforcing the Tennessee Hazardous Waste Management Act (T.C.A. Section 68-212-101 et seq.).

II.

Tom Tiesler is the duly appointed Director of the Division of Solid Waste Management (the 'Division') He has received written delegation to administer and enforce particular aspects of the Tennessee Hazardous Waste Management Act.

III.

Tennsco Corp (hereinafter referred to as the 'Respondent" or "Tennsco'), is an active company conducting business in Dickson, Tennessee. Its agent for service of process is Mr Keith C Stanton, 201 Tennsco Drive, Dickson, Tennessee 37055.

JURISDICTION

IV.

Pursuant to Tennessee Code Annotated (hereinafter "T.C.A.) Section 68-212-114(b), the Commissioner may assess a civil penalty of up to FIFTY THOUSAND

DOLLARS ($50,000) per day for each day of violation of the Tennessee Hazardous Waste Management Act (the "Act"), or any rules and regulations promulgated pursuant to the Act, against any person who violates the Act or rules or regulations. In addition, the same statute authorizes the Commissioner to assess damages which may include any reasonable expenses incurred in investigating and enforcing the Act. T.C.A. Section 68-212-111 authorizes the Commissioner or his authorized representative to issue an Order for Correction to responsible parties for violations of the Act or rules or regulations promulgated thereunder.

V.

The Respondent is a "person" within the meaning of T.C.A. Section 68-212-104 and has violated provisions of the Act and the rules.

FACTS

VI.

The Respondent is a manufacturer of metal welded cabinets, lockers, shop equipment, and filing cabinets. The facility is comprised of six separate facilities located in Dickson, and employs approximately 300 people. Plant 2/3, the object of the inspection, consists of two buildings located on one continuous site and is considered one facility, with one EPA identification number. It is referred to as Plant 2/3 to acknowledge that there are two production buildings on the site. The facility is a fully regulated generator, and as such, may store hazardous waste on-site for less than 90 days without a permit, provided that specific provisions of the hazardous waste regulations are met. The Respondent's EPA identification number is TND 98-004-5390.

VII.

On February 7, 1996, a routine Compliance Evaluation Inspection (CEI) of a Large Quantity Hazardous Waste Generator was conducted at Tennsco Plant 2/3 in Dickson, Tennessee. On February 12, 1996, the Division issued Tennsco a Notice of Violation (NOV) for the violations cited on the aforementioned inspection. Following issuance of the NOV, the facility was invited to meet with the Division in a show cause meeting to discuss the alleged violations. The meeting was held on May 23, 1996. During the show cause meeting, a review of the hazardous waste manifests indicated that the company had complied with the 90-day storage requirements, but not the labeling requirements. In fact, the facility failed to properly label and place accumulation start

dates on thirty-six (36) drums. The other cited violations were demonstrated to have come under compliance since the inspection.

VIOLATIONS

VIII.

The Respondent is charged with having violated the following regulations promulgated under the Tennessee Hazardous Waste Management Act and its regulations.

IX.

By failing to properly label and date accumulation storage drums, the facility violated Rule 1200-1-11-.03(4)(e)2, which states:

> Except as provided in parts 6,7, and 8 of this subparagraph, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:
> (ii) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
> (iii) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste."

X.

By failing to document inspections on the hazardous waste accumulation area, the facility violated Rule 1200-1-11-.03(4)(e)2(i)(I) which in turn refers to 40 CFR 265.174, incorporated by reference at Rule 1200-1-11-.05(9)(a), which states:

> The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

XI.

By failing to have installed the proper emergency alarm system, communications equipment, and spill control equipment, the facility violated Rule 1200-1-11-.03(4)(e)2(iv) which in turn refers to 40 CFR 265.32, incorporated by reference at Rule 1200-1-11-.05(3)(a), which states:

> All facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:
> (a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;
> (b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency

assistance from local police departments, fire departments, or State or local emergency response teams;

(c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and

(d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

XII.

By failing to provide adequate aisle space in the accumulation area, the facility violated Rule 1200-1-11-.03(4)(e)2(iv) which in turn refers to 40 CFR 265.35, incorporated by reference at Rule 1200-1-11-.05(3)(a), which states:

> The owner or operator must maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

ORDER

WHEREFORE, PREMISES CONSIDERED, pursuant to the authority vested by T.C.A. Section 68-212-114 and T.C.A. Section 68-212-111, I, Tom Tiesler, acting as the authorized representative of the Commissioner, hereby, after proper consideration of the harm done to the public health or the environment, the economic benefit gained by the violator, the amount of effort put forth by the violator to attain compliance, and any unusual or extraordinary costs incurred by the Commissioner, ORDER that:

1. The Respondent shall fully comply with Act and Division Regulations in the future.

2. The Respondent is assessed a CIVIL PENALTY in the amount of ONE THOUSAND DOLLARS ($1,000.00).

3. The above assessed CIVIL PENALTY shall be paid to the Tennessee Department of Environment and Conservation within thirty (30) days of the receipt of this ORDER.

Issued this 8th day of January, 1997 in the office of the Director of the Division of Solid Waste Management, Tennessee Department of Environment and Conservation.

Tom Tiesler, Director
Division of Solid Waste Management
Tennessee Department of Environment
and Conservation

NOTICE OF RIGHTS

The Respondent is hereby advised that in accordance with T.C.A. Section 68-212-113 it may secure a review of the necessity for or reasonableness of this ORDER by filing with the Commissioner, a written petition, setting forth the grounds and reasons for objection and asking for a hearing before the Solid Waste Disposal Control Board. This ORDER shall become final and not subject to review unless the Respondent petitions for a hearing within thirty (30) days after this ORDER is served. The hearing will be conducted in accordance with the Tennessee Uniform Administrative Procedures Act, T.C.A. 4-5-301 et seq.

All correspondence pertaining to this matter should be addressed to Charles Allen, L&C Tower, 5th Floor, 401 Church Street, Nashville, Tennessee 37243-1535, Phone (615) 532-0780.

Charles Allen
Enforcement Section

Hazardous Waste Notification

DSWM EC

Tennessee Department of Environment and Conservation: Division of Solid Waste Management
Fifth Floor, L & C Tower: 401 Church Street: Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name			Installation identification number
TENNSCO CORPORATION PLANT 2/3			TND 98-084-5390
2. Mailing address: PO BOX 606	City: DICKSON	State: TN	Zip code: 37055
3 a. Site address: FIRST & PICKETT STS	City	State	Zip code: 37055 / County name: Dickson
b. Latitude (degrees, minutes & seconds): 36.0500	Longitude (degrees, minutes & seconds): 87.2409		
4. Owner name (may be corporation or company name): LESTER SPEYER		Type	Phone with area code: (615) 446-8000
5. Manager or operator name: MICKEY SELF		Type	Phone with area code: (615) 446-8000
6. Principal technical contact: MICKEY SELF	FAX number with area code		Phone with area code: (615) 446-8000

7. Number of employees	Year operation began	SIC codes (Primary SIC first.etc.)	Job shop
300	1958	2542, , ,	Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a. MICKEY SELF	ALL TIMES	(615) 446-8000
b. #ROY STINSON	ALL TIMES	(615) 446-4564
c.	HOME	(615) 446-9432
d.	HOME	(615) 789-5618

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Mickey B. Self	EXECUTIVE ASST.	1-7-98

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
01-30-1998	22		Yes No Y	Yes No N	

12. Date closed	TSDR status	Transporter status

13. Comments

CN-0909(Rev.11/95)

RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management
Fifth Floor, L & C Tower. 401 Church Street. Nashville. TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility	**Installation identification number**
TENNSCO CORPORATION PLANT 2/3	TND 98-084-5390

2. **Waste name.** Use standard name from regulations whenever possible.	WASTE STREAM NUMBER
LIQUID WASTE PAINT	4

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation
1992		Continuous Accidental/ Various One time ----- (V)

4. Circle all appropriate **hazard criteria** below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g) AF	EPA **waste codes**. (Primary first; six maximum.)	**SIC code** for generating process.
	D001, F003, F005	2542;

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel. chlorine content(PPM)	BTU per pound
Liq-Othr (3)	50		10.000	0.0	11,500.0

6. **Generation rates** in kilograms. Monthly ~~maximum~~ (kg)	Annual average ~~(kg)~~	Maximum stored onsite (kg)	Maximum days stored
~~26,000.0~~ 5500	~~70,000.0~~ 12,000	~~50,000.0~~ 10,000	90

7. **DOT shipping** name	DOT hazard class		DOT ID code
WASTE FLAMMABLE LIQUID	ORM-D	10	UN1993

8. Describe the **generation process.**
COLLECTED AND TEMPORARILY STORED IN 55 GALLON DRUMS. (1) VARIES TO NO GENERATION

9. **Chemical Characteristics.** pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )	
	>140F			
Hazardous constituents. Give range of values at right. A.			lower value	upper value
B.				
C.				
D.				
E.				

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

T50

RECEIVED
JAN 2 1 1998
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility	**Installation identification number**
TENNSCO CORPORATION PLANT 2/3	TND 98-084-5390

2. **Waste name.** Use standard name from regulations whenever possible.	WASTE STREAM NUMBER
WASTE PAINT SOLID	5

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation
1992		Continuous Accidental/ Various One time ——— (V)

4. Circle all appropriate **hazard criteria** below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g)	EPA **waste codes**. (Primary first; six maximum.)	**SIC code** for generating process.
AF	D001, F003, F005	2542;

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel. chlorine content(PPM)	BTU per pound
Sld:Othr (9).	1 + 1		10.000	0.0	12,500.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
20,000.0	65,000.0	50,000.0	90

7. **DOT shipping** name	DOT hazard class		DOT ID code
WASTE FLAMMABLE SOLID	Explosives	01	

8. Describe the **generation process**.

NO WASTE GENERATED IN 1997

9. **Chemical Characteristics.** pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes. % volume( ), % weight( ), PPM( ) ( )	
	140F			

Hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

RECEIVED
JAN 9 1998
Solid & Hazardous Waste Div. of

4(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility	Installation identification number
TENNSCO CORPORATION PLANT 2/3	TND-98-084-5390

2. Waste name. Use standard name from regulations whenever possible.	WASTE STREAM NUMBER
WASTE PHOSPHORIC ACID SOLUTION	7

3. Give the years that this waste has been generated. e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1997	12-31-97	Continuous ~~Accidental~~/ Various (One time)

4. Circle all appropriate hazard criteria below. Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Other toxic (f). TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
C	D002	2542

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
3 LIQUID		N/A	8.32	N/A	N/A

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
510	510	510	90

7. DOT shipping name	DOT hazard class	DOT ID code
PHOSPHORIC ACID WASTE	2	UN3264

8. Describe the generation process.

RAW MATERIAL (PHOSPHORIC ACID USED IN MANUFACTURING) DECLARED A WASTE BECAUSE NO LONGER NEEDED.

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume( ). % weight( ). PPM( )
<1.0			

Hazardous constituents. Give range of values at right.	lower value	upper value
A. PHOSPHORIC ACID	N/A	N/A
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

NEUTRALIZATION - T31

RECEIVED
JAN 9 [illegible]
Solid & Hazardous Waste Div. of

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility	Installation identification number
TENNSCO CORPORATION PLANT 2/3	TND-98-084-5390

2. Waste name. Use standard name from regulations whenever possible.	WASTE STREAM NUMBER
WASTE CAUSTIC SOLUTION	6

3. Give the years that this waste has been generated. e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1997	—	Continuous / Accidental/ One time / (Various)

4. Circle all appropriate hazard criteria below. Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Other toxic (f). TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
C	D002	2542

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
LIQUID 2		~70	8.32	N/A	N/A

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
300	300	250-300	90

7. DOT shipping name	DOT hazard class	DOT ID code
WASTE SODIUM HYDROXIDE SOLUTION	2 8	UN 1824

8. Describe the generation process.

CAUSTIC USED TO CLEAN PAINT LINE

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume( ), % weight( ), PPM( )
>10.0	—	—	

Hazardous constituents. Give range of values at right.

	lower value	upper value
A. NA OH	N/A	N/A
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

NEUTRALIZATION — T31

PRINTED
JAN 9 1998
Solid & Hazardous Waste

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE FIELD OPERATIONS
NASHVILLE ENVIRONMENTAL FIELD OFFICE
3000 MORGAN ROAD
JOELTON 37080

January 13, 1999

CERTIFIED MAIL Z 137 708 914
RETURN RECEIPT REQUESTED

Mr. Rocky Bowker, Environmental Coordinator
Tennsco
201 Tennsco Drive
P.O. Box 1888
Dickson, TN 37050-1888

TND 98-004-5390

RE: NOTICE OF VIOLATION
Tennessee Hazardous Waste Management Act

Dear Mr. Bowker:

This letter confirms the observations and recommendations which were made during the Large Quantity Hazardous Waste Generator Inspection concerning your facility on January 6, 1999. The attached inspection report details the violations which were noted during the inspection.

Immediate action should be initiated to correct these violations. A follow-up inspection will be made after February 8, 1999 to verify that the appropriate corrective action has been taken.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 299-9922.

Sincerely,

Tom Yates

Tom Yates
Division of Solid Waste Management

TDY/bbm/tenn9184.doc

cc: DSWM - Central Office
U.S.E.P.A., Region IV

HAZARDOUS WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION:

Tennsco Plant 2/3
TND 98-004-5390
P.O. Box 606
First & Pickett Street
Dickson, TN 37056
Dickson County

PRIMARY CONTACT:

Rocky Bowker, Environmental Coordinator
Tennsco
P.O. Box 1888
201 Tennsco Drive
Dickson, TN 37056-1888
(615) 446-8000
FAX (615) 446-7224

DATE/TIME OF INSPECTION:

January 6, 1999
approximately 10:00 a.m.

INSPECTION PARTICIPANTS:

Tom Yates, Tennessee Department of Environment and Conservation, Division of Solid Waste Management, Nashville/Joelton Environmental Assistance Center
Rocky Bowker, Environmental Coordinator, Tennsco
Charles Carr, Paint Supervisor, Tennsco

REPORT PREPARED BY:

Tom Yates
Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Nashville/Joelton Environmental Assistance Center
3000 Morgan Road
Joelton, TN 37080
Phone: (615) 299-9922
Fax: (615) 299-8749

PURPOSE OF INSPECTION:

This inspection was conducted to evaluate the Tennsco Plant 2/3 compliance with the applicable requirements of the Rules and Regulations promulgated pursuant to the Hazardous Waste Management Act, T.C.A. 68-212-101 et. seq. and the "Tennessee Waste Reduction Act," T.C.A. 68-212-301 et. seq.

FACILITY DESCRIPTION:

Tennsco manufactures metal welded cabinets, lockers, shop equipment and filing cabinets. Tennsco was originally Diebold Company and began operation in 1958. In January, 1962, Diebold sold the company and it became Tennsco. Tennsco is comprised of six separate facilities located in Dickson and employs approximately 300 people. Plant 2/3, the object of this inspection, consists of two buildings located on one continuous site and is considered one facility, has one EPA identification number. It is referred to as Plant 2/3 to acknowledge that there are two production buildings on site. The Plant 2/3 buildings were acquired in 1980 and production began around that time. The production processes used at Plant 2/3 include stamping, welding, shaping and painting. The administrative offices are located at 201 Tennsco Drive and this is the location of Rocky Bowker's (the inspection contact) office.

The Standard Industrial Classification (SIC) codes used by Tennsco include 2542, 2851, 3316, 3429 and 3452.

Tennsco reported generating over 1000 kg of hazardous waste in at least each of 3 months on their most recent annual report. Based on this information, they are classified as a large quantity hazardous waste generator.

INSPECTION FINDINGS:

This inspection consisted of a records review and a facility inspection. The records review included annual reports, manifests, contingency plan, waste reduction plan, training records, and inspection logs. The facility inspection included the waste generation processes, satellite accumulation, the less than 90 day accumulation area, and used oil containers.

Hazardous waste is generated from Tennsco's wet paint operations. The following hazardous waste stream is currently generated:

Waste Stream #4: Paint/Solvent
EPA Waste Codes: D001, F003, F005
Estimated Monthly Maximum: 5500 kg

Generation Process: Cleaning of wet paint line equipment. Two satellite containers are in use for accumulation of this waste. One is located at what is known as the L & T paint line and the other is at what is known as the K-D line. Neither of these satellite containers were properly marked with the words "Hazardous Waste".
Major Hazardous Constituents: Methyl ethyl ketone, toluene

A significant amount of paint waste like material generated by the liquid paint operation in Plant 3 is suitable to be used as an ingredient to make new paint. This paint material is collected in a 300 gallon tote tank provided by the paint manufacturer and is returned to them when it is full. The paint manufacturer uses this paint material in manufacturing new paint.

A one time generation of a caustic soda waste occurred in 1997 from the hardening of a cleaning powder, which caused it to be unusable. This situation is now corrected by the changing to a liquid cleaner.

The less than 90 day accumulation area is in a separate building adjacent to the plant. At this inspection, only one drum marked "Hazardous Waste" was seen in the area. The area was disorganized and housekeeping was generally poor. This condition was in part due to preparation for moving the less than 90 day accumulation area to a new structure which is very near completion. A review of the regulations pertaining to the emergency equipment, alarms communication, and other requirements for hazardous waste accumulation areas is recommended to ascertain that the new area is in compliance.

It is also noted that Tennsco is in the process of converting their wet painting operations to powder painting. The elimination of wet painting has reduced their hazardous generation. It was explained that the intention is to eventually convert all painting to powder painting.

Containers used to accumulate used oil had not been marked with the words "Used Oil".

The records review revealed that no hazardous waste training was done in 1998, and therefore, the regulation requirement to conduct annual hazardous waste training had not been met.

VIOLATIONS:

Rule 1200-1-11-.05(2)(g)3 states in part:

Facility personnel must take part in an annual review of the training required in part 1 of this subparagraph. Part 1 (iii) states:

(iii) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by

familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:

(I) Procedures for using, inspection, repairing, and replacing facility emergency and monitoring equipment;

(II) Key parameters for automatic waste feed cut-off systems;

(III) Communications or alarm systems;

(IV) Response to fires or explosions;

(V) Response to ground-water contamination incidents; and

(VI) Shutdown of operations.

Based on the training records reviewed, the last hazardous waste training was done approximately in June, 1997.

Rule 1200-1-11-.03(4)(e)2.(iii) states in part:

While hazardous waste is being accumulated on-site, each container and tank used for that purpose be labeled or marked clearly with the words "Hazardous Waste".

The satellite containers located at the paint lines known as L & T paint line and K-D paint line were not marked "Hazardous Waste".

Rule 1200-1-11-.11(3)(c)3(i) states:

Containers and aboveground tanks used to store oil at generator facilities, must be labeled or marked clearly with the words "Used Oil".

The containers seen that were used to accumulate used oil were not properly marked.

TCA 68-212-306 "Tennessee Hazardous Waste Reduction Act of 1990" states in part:

68-212-306. Annual progress report.--(a) All generators shall annually review their waste reduction plan and complete a hazardous waste reduction progress report which shall:

(1) Analyze and quantify progress made, if any, in hazardous waste reduction, relative to each performance goal established under § 68-212-305(b); and

(2) Set forth amendments, if needed, to the hazardous waste reduction plan and explain the need for the amendments.

(b). Except for the information reported to the department under § 68-212-308, the annual progress report shall be retained at the facility and shall not be considered a public record under title 10, chapter 7, part 5. However, the generator shall permit any officer, employee or representative of the department at all reasonable times to have access to the annual progress report.

(c) Large quantity generators shall complete the first annual progress report required under subsection(a) on or before March 1, 1993. Small quantity generators shall complete the first annual progress report required under subsection (a) on or before March 1, 1995. [Acts 1990, ch. 754, x 7; T.C.A., § 68-46-306.]

A hazardous waste reduction plan annual progress report, as required by the Waste Reduction Act of 1990, was not available for review.

REMARKS:

A fax from Rocky Bowker, dated January 7, 1999, addressing some of the questions that came up during the inspection, was received. With regard to paint waste generated at Plant 1, the fax verified this waste was non-hazardous and had been granted a special waste approval. The fax also explained the one time generation of caustic soda, EPA ID code D002 waste. In addition, it confirmed that no annual training had been done in 1998, and that steps were being taken to schedule training by the end of the month.

I appreciate the time and cooperation I was given during the inspection. If there are any questions regarding this report, contact Tom Yates at (615) 299-9922.

SIGNED: Tom Yates DATE: Jan. 19, 1999

REVIEWED: [signature] DATE: Jan 19, 1999

cc: DSWM-Central Office
U.S.E.P.A., Region IV

ASWM, LCC

96 **STATE OF TENNESSEE** 96

HAZARDOUS WASTE CASE PROFILE REPORT

Rev. 9/1/96

ARCHIVE WATCH **NO** The named facility was cited in 96 for these violations: . At that time, a penalty of $1000.00 was assessed. Previous repeat violations may constitute the status of a Significant Non Compliant facility (SNC). The archived case included these notes:	CIV TENNSCO NASH TND980615390 96 H0023 380 CLOSED 201 TENNSCO DRIVE DICKSON TN 37056 COUNTY: DICKSON COUNTY CODE 43 INSPECTION CROSS REFERENCES: 95SEQ 96SEQ 97SEQ

Narrative

An inspection was conducted on 2/7/96 by T YATES (615) 299-8451 of the NASH field office.
A Notice of Violation was issued 2/12/96 detailing 5 violations. An Enforcement Action Request (EAR) dated 2/27/96 was received in Enforcement on 3/1/96. The case was assigned to ALLEN-094R on
The target date for completion of this case is 8/5/96.

This case was closed on **1/30/97**

THE FACILITY WAS CHARGED WITH THE FOLLOWING VIOLATIONS:

no.	code	violation	violation condition	1200 code	CFR	violation status	
1	C1	C1- CONTNRLABL	36 DRMS NO HW LABEL	1200-1-11-.03(4)(e)5(i)(I)	265.17	CLOSED	CORRECTED
2	C4	C4A- ACCUMDATE	36 DRMS NO ACC DATE	1200-1-11-.03(4)(e)5(iv)(	262.34(a)(2)	CLOSED	CORRECTED
3	D3	D3- CONTGPLANS	NO EMER ALRM, COMM EQUPT, SPLL	1200-1-11-.05(4)(a)1	265.5	CLOSED	CORRECTED
4	D5	D5- AISLESPACE	INSUFF AISLE SPCE HW ACCUM	1200-1-11-.03(4)(e)2(iv)	265.35	CLOSED	CORRECTED
5	D7	D7- FAILTOINSPCT	INSPCTNS NOT DONE HW ACC AREA	1200-1-11-.03(4)(e)3(ii)	265.174	CLOSED	CORRECTED

CASE CLOSED

Notice: an "R" indicates a *REPEAT VIOLATION*

TOTAL VIOLATIONS 5

TOTAL HPVs

 # OUTSTANDING HPVs

 # OUTSTANDING VIOLATIONS

ORIGINAL PENALTY $1000.00

CONTINGENT

DATE PAID 1/27/97

DAMAGES

AMOUNT PAID $1000.00

AMOUNT SUSPENDED

FINAL PENALTY $1000.00

BALANCE OWED $0.00

PAYMENTS

BALANCE ZEROED

DIR ORD 1/9/97

DATE ORDER SIGNED 1/9/97

COMM ORD

AGREED ORDER

ORDER STATUS **CLOSED**

DATE APPEALED

OGC#

DATE SENT TO OGC

ATTORNEY

ID INDICATES NEW WILL ISSUE NV 7/19/96; CASE WAS CLOSED AS INDICATED, THEN AN ORDER APPEARED WITH A PAYMENT; RECORD WAS ALTERED TO SHOW CHANGE

old UAR enforcement deleted

REGULATORY REVIEW DOCUMENTS

WABASH ALLOYS
DIVISION OF CONNELL LIMITED PARTNERSHIP

(4 Pages)

Hazardous Waste Notification DSWM 1.2 JAN 05, 1990

Mark changes on this form. Full instructions are given with Form PH-2019A.

1. Organization's name
WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP | EPA ID CODE TND 98-776-6524

2. Mailing address | City | State|Zip
R.R. 8 SOUTH PRINTWOOD DR | DICKSON | TN 37055

3. Physical location or address | County name
R.R.8 SOUTH PRINTWOOD DR | DICKSON

Latitude | Longitude
36.2300 | 87.2100

4. Owner name | Phone
CONNELL LIMITED PARTNERSHIP | (617) 567-2600

5. Manager or operator name | Phone
DENNY LUMA (PLANT MANAGER) | (615) 446-0600

6. Principal technical contact | Phone
DENNY LUMA | (615) 446-0600

7. Number of employees | Year began | SIC codes | Job shop
~~55~~ 60 | 1987 | 3341, , , | NO

8. Emergency contacts

Name	Time period covered	Phone
A DENNY LUMA	24 HRS	(615)446-0600
B ANDY LUNN	24 HRS	(615)446-0600
C PAUL GAMARY	24 HRS	(615)446-0600
D EDWIN J STOLARZ	24 HRS	(219)563-7461

9. Current environmental permits for air, water, and radiol
Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.
AIR PERMIT - #026738P - EXP 3/1/90^AIR PERMIT - #025574P - EXP 3/1/94^

10. Check hazardous waste fuel burning activities below.
Fuel blending or marketing a( ) Fuel burning . . . c( )
Transporting fuel . . . b( )

11. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date

Dennis B. Luma Plant Manager 2/23/90

Below is for Department use only.

12. Date rcvd	County	Priority	Generator		Small Gen.		Special status
			Yes	No	Yes	No	
2-26-90			(Yes)			(No)	

13. Date closed	Date regulated	Date deregulated	Insp. Freq.
/00/00	/00/00	/00/00	

14. Comments

Hazardous Waste Stream Report - Front JAN 05, 1990

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name. | EPA ID CODE
WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP | TND 98-776-6524

2. Waste name. | Waste stream ID
DUST FROM FURNACE BAGHOUSE | 1

3. Give years waste generated | Date stopped | Frequency of generation
1988 - ~~Present~~ | /00/00 | Continuously

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES: B | D006D008 | 3341

5.

Physical form	% Solid	% Water	Lb./gal.	Chlorine PPM	BTU/lb.
GRANULAR SOLID	100.0	0	~~800,000~~ 3.96	.0	.0

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
4545 ~~7X000~~	33,000 ~~84,000~~	13,600 ~~20,000~~	90

7. DOT shipping name | DOT hazard class | DOT ID code
RQ HAZARDOUS WASTE, SOLID, NOS (D006, D008) | O R M - E | NA9189

8. Describe generation process.
BAGHOUSE TYPE DUST COLLECTOR FROM #2 AND #3 SECONDARY^ALUMINUM GAS FIRED REVERBERATORY FURNACES.^

** ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1989	32,727	42,345	~~4096~~ 4096

	Amount Handled by site		TSDF handling/Waste management methods
A	OFFSITE: ~~76482~~	N	D80
B	ONSITE:	Y	
C	ONSITE:	Y	
D	ONSITE:	Y	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification c( )
d. Substituting raw materials d( )
e. Improved operations. . . . e( )
f. No effort. . . . . f(X)
g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c(X). | Amt of Reduction
| 0 (kg)

DSWM L:C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full legal name WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP				EPA identification code TND 98-776-6524
2. Mailing address 600 PRINTWOOD DR	City DICKSON	State TN	Zip code 37055	
3 a. Site address 600 PRINTWOOD DR, DICKSON, TN 37055	City	State	Zip code	County name Dickson
b. Latitude (degrees, minutes & seconds) 36.2300	Longitude (degrees, minutes & seconds) 87.2100			
4. Owner name CONNELL LIMITED PARTNERSHIP				Phone with area code (617)567-2600
5. Manager or operator name DENNY LUMA (PLANT MANAGER)				Phone with area code (615)446-0600
6. Principal technical contact DENNY LUMA				Phone with area code (615)446-0600
7. Number of employees 67	Year operation began 1987	SIC codes (Primary SIC first,etc.) 3341, , ,		Job shop Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	DENNY LUMA	24 HRS	(615) 446-0600
b.	ANDY LUNN	24 HRS	(615) 446-0600
c.	PAUL GAMARY	24 HRS	(615) 446-0600
d.	EDWIN J STOLARZ	24 HRS	(219) 563-7461

(9.) List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.

#

STATE AIR PERMIT . 035313P exp. 3/1/97; 733198P exp. 3/1/94; 933707P under renewal 931749P under renewal

10. Check the activities below you are engaged in related to recycling or burning hazardous waste as a fuel.
a. Fuel blending or marketing of hazardous waste as a fuel . . . . . a( )
b. Transporting hazardous waste as fuel . b( )
c. Burning hazardous waste as fuel . . . c( )

d. Do you receive RCRA hazardous waste from off-site and recycle it? Yes ( ), No (X).

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Dennis B. Luma	Plant Manager	2/18/94

*** Below is for Department use only ***

(12) Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
3-9-94	92		N	N	

13. Date closed	Date regulated	Date deregulated

(14.) Comments Postmarked 2-28-94 DBW

RECEIVED
MAR 09 1994

CN-0909 (10-92)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility.	EPA identification code
WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP	TND 98-776-6524

2. Waste name. Use standard name from regulations whenever possible.	Waste Stream number
DUST FROM FURNACE BAGHOUSE	1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Frequency of generation: Continuous ~~NO~~	Accidental/ One time	(C) Various X
1988- 1991 , 1993	05/15/93			

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
	D006, ~~XXX~~	3341,

5. Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	If used for fuel, BTU per pound
Sld:Gran (8)	100.0	.0	3.760	0.0	0.0

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual ~~average~~ (kg)	Maximum amount stored on-site (kg)	Maximum days stored
7,273.0	12,356	12,356	90

7. DOT shipping name	DOT ~~hazard~~ class		DOT ID code
RQ HAZARDOUS WASTE, SOLID, NOS (D006, ~~XXX~~)	O R M - E	12	NA9189

8. Describe generation process.

Baghouse type dust collector form #2, #3, #4, and #6 secondary aluminum gas fired reverberatory furnaces.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM(X)
9.5	>200	None	

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. ~~XXXXXXXXX~~	~~XXXXX~~	~~XXXXXX~~
b. CADMIUM (D006)	.013	4.40
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

8(N)

Hazardous Waste Stream Report - Front JAN 06, 1989

l instructions for form PH-2022 for additional information and codes.

ganization's name.
SHLAND CUSTOM CLEANERS | EPA ID CODE
TND 98-102-4797

ste name.
STE PERCHLOROETHYLENE BOTTOMS | Waste stream ID
1

ve years waste generated | Date stopped | Frequency of generation
1987 /00/00 CONTINUOUS

rk all appropriate hazard criteria below. | EPA waste codes | SIC
nitable (a), EP toxic (b), Corrosive (c),
active (e), Other toxic (f),
DES| F
|F002 | 7216

ysical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
ER SOLID | .0| | 10.000 | .0 | .0

eration rates in Kilograms.
thly maximum | Annual average | Max. amount stored | Max. days stored
62 745 30

pping name
TE PERC | DOT Hazard class | DOT ID code
O R M - A UN 1897

cribe generation process.
~~[illegible]~~ GENERATED THRU DRYCLEANING PROCESS
Bottoms

UAL REPORT SECTION ** LINES 9-11

| Amount generated during year (kg) | Amount on site on first day (kg) | Amount on site on last day (kg)
| 91 | 0 | 0

| Amount Handled | Handled On site? | TSDF handling/Waste management methods
A | 91 ~~82~~ | Y N | T-63
B | | Y N |
C | | Y N |
D | | Y N |

eck the efforts undertaken to reduce the volume and toxicity in the
neration of this waste during the reported year.
ormulation/redesign of product a( ) d. Substituting raw materials d( )
process recycling. . . . . b( ) e. Improved operations. . . . e(X)
ipment/technology modification c( ) f. No effort. . . . . f( )

er - explain below: . . . . . g(X)
Safety Kleen

ribe changes in volume and toxicity that those reduction efforts
ked in line 10 produced last year compared to the previous year.

toxic-a( ) b. less toxic-b( ) c. No change-c(X) | Amt of Reduction

Hazardous Waste Stream Report - Back JAN 06, 1989

.l instructions for form PH-2022 for additional information and codes.

ganization's name.
ND CUSTOM CLEANERS | EPA ID CODE
TND 98-102-4797

ste name.
STE PERCHLOROETHYLENE Bottoms | Waste stream ID
1

emical Characteristics.
| Flash point | Reactive code | Concentration units. For EP toxic wastes, indicate PPM.
None

jor and hazardous consituents.
Perchloroethylene

| lower | upper
Paper, Metal, Carbon, clay, Dirt + water 10 50
50 90

this waste is recovered, reclaimed, recycled, or reused, describe how.

Safety Kleen

certify that this information is true, accurate and complete.
GNATURE (Generator or authorized representative), title and date.

[signature] [signature] X 2-21-89

ls for department use only.

| Complete? | Test results? | Reasonable? | Follow-up | Initials
| Yes No | Yes No | Yes No | Yes No | LG

Not hazardous (1); Demonstrated not hazardous (2); Status Report
enerator (3); Resource recovery (4); 4 Y
exemption (5); Hazardous (6);
tal (7); No longer generated (8); Variance granted (9); Condi-
y exempt (A); Mixed radiological wastse (R).

ments.

RECEIVED
FEB 28 1989
ENV. OF SWM

Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403 (Corrected copies)

1. Organization's full name at facility.
Washland Custom Cleaners

EPA identification code
TND 98-102-4797

2. Waste name. Use standard name from regulations whenever possible.
Filters

Waste Stream number
2

3. Give the years that this waste has been generated, e.g. 1975, 1982-.
1987

Date no longer generated. (MM/DD/YY)

Frequency of generation
Continuous (circled) Accidental/One time Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f).
F

EPA waste codes. (Primary first)
F002

SIC code for generating process.

5. Physical form
other solid

Percent solid	water	Vol. to wt. conversion (pounds per gallon)	If used for fuel, chlorine content	BTU per pound
1 %	%	10	PPM	/lb.

6. Generation rates. Supply all rates in kilograms.

Monthly maximum	Annual	Maximum amount stored on site	Maximum days stored
45.4 (kg)	465 (kg)	14 (kg)	60

7. DOT shipping name
Safety-Kleen Corp.

DOT hazard class
UN1897

DOT ID code
TLD 000805911

8. Describe generation process.
still sludy from Dry cleaning machine

\#\#\# ANNUAL REPORT SECTION \#\#\# Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

Annual generation and handling data. If waste was shipped off site, also submit Annual Shipping Report for hazardous waste generators. For handling in a permitted facility, use "T", "S", or "D" codes from instructions. For other handling, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on site on first day of year (kg)	Amount on site on last day of year (kg)
1987	578	0	0

	Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods		Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods
a	578	N (circled)	T-63	b			
c				d			

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.
a. Reformulation/redesign of product . a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification . c( )
d. Substituting raw materials . . . . d( )
e. Improved operations. . . . . e( )
f. No effort. . . . . f( )
g. Other - explain below: . . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to the previous year
Amount of Reduction (kg)
a. Increased toxicity-a( ), b. decreased toxicity-b( ), c. No change-c( ).

RECEIVED ... 1988 ... DIV. OF SWM

PH-2022(SWM 11/87 Rev.)